Liberty 2026-2028 Base WMP Discovery Log

Last Updated: 7/31/2025

Count	Party Name	IR Set #	Data Request	Question No.	Question ID	Question	Response	Requestor	Date Received	Final Date Due	Date Sent	Links	Number of Attachments	Attachment Links	NOA Required?	WMP Section	Category	Subcategory
1	DRS	1	DRS-P-WMP_2025-Liberty-001	1	DRS-001-Q01	Q01. Regarding Vegetation Management Inspection Targets: In Table 4.3 of its 2026-2028 WMP, Liberty reports 1,476.9 circuit miles of overhead distribution lines and 32.89 circuit miles of transmission lines, totaling 1,509.79 combined circuit miles of distribution and transmission overhead lines. In Table 9-2, Liberty provides a three-year total of 660 circuit miles for its "Vegetation Management Inspection Program—Detailed" and reports a cumulative quarterly target for 2026 Q4 of 700 circuit miles for its "Vegetation Management Program—LiDAR." In Table 9-3 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 "Transmission and Distribution," "Area Inspected" as "Territory," and "Frequency" as "Annual." a. Does the "Three-Year Total" target for "Vegetation Management Program—Detailed" include all overhead circuit miles in Liberty's territory? i. If yes, explain the different number of circuit miles reported in Table 4.3 and the "Three-Year Total" target for "Vegetation Management Program—Detailed." ii. If no, explain why Liberty does not include all overhead circuit miles in its three-year inspection cycle. b. Does the "Cumulative Quarterly Target, 2026 Q4" for "Vegetation Management Program—LiDAR" include all overhead circuit miles in Liberty's territory? i. If yes, explain the different number of circuit miles reported in Table 4.3 and the "Cumulative Quarterly Target, 2026 Q4" target for "Vegetation Management Program—LiDAR." ii. If no, explain why Liberty does not include all overhead circuit miles from the 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-120kV). The target does not include the secondary voltage class distribution lines that are included in Table 4.3. The total miles of overhead primary distribution and transmission circuits is approximately 700 miles. Liberty intends to complete detailed inspections on one third of its overhead primary distribution and transmission system per year. Liberty also inspects secondary lines along its primary distribution system. These secondary line 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-120kV). The target does not include the secondary voltage class distribution lines that are included in Table 4.3. 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://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DRS-P-WMP_2025-Liberty-001.pdf			No	9	Vegetation Management and Inspections	
1	DRS	1	DRS-P-WMP_2025-Liberty-001	2	DRS-001-Q02	Q02. Regarding Inspection Documentation: a. Provide the most recent versions of the following procedures documents: i. Vegetation Management Plan (VM-02); ii. Hazard Tree Management Plan (VM-03); iii. Vegetation Management Inspections (VM-04); iv. Vegetation Threat Procedure (VM-05); v. Vegetation Management Notification and Refusal Resolution Policy (VM-06); vi. Vegetation Management Inspection Manual (VM-07); vii. Fire Prevention Plan.	a. Refer to attachments "Liberty Response_DR-001-Q02-vi" and "Liberty Response_DR-001-Q02-vii."	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DRS-P-WMP_2025-Liberty-001.pdf	2		No	9	Vegetation Management and Inspections	
1	DRS	1	DRS-P-WMP_2025-Liberty-001	3	DRS-001-Q03	Q03. Regarding Pole Clearing Tree Clearing Target (WMP VM-PRM-02): 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." Of the 4,900 poles targeted for pole clearing, specify how many of those poles: i. Are required to be cleared under Public Resources Code (PRC) 4292 (i.e., poles in the SRA); ii. Are not required to be cleared under PRC 4292 (i.e., poles not in the SRA); iii. Are not required to be cleared under PRC 4292 but are required to be cleared to standards under Liberty's standard operating procedures that require those poles to be cleared. b. On page 170 of its 2026-2028 WMP, Liberty sets annual targets in 2026, 2027, and 2028 of 4,900 poles. On page 200 of its 2023-2025 Base WMP, Liberty set annual targets in 2023, 2024, and 2025 of 4,960 poles. Provide justification and details of planned or completed activities which support that the volume of pole clearing work required during Liberty's 2026-2028 WMP cycle will decrease by 60 poles.	i. Of the approximately 4,900 poles targeted for pole clearing, approximately 4,100 are required to be cleared under Public Resources Code (PRC) 4292. ii. Of the approximately 4,900 poles targeted for pole clearing, approximately 450 are not required to be cleared under Public Resources Code (PRC) 4292. iii. The applicable standard that requires Liberty to clear those poles not subject to PRC 4292 is outlined in the Liberty 2026-2028 Wildfire Mitigation Plan, Section 9.4.1. c. 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://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DRS-P-WMP_2025-Liberty-001.pdf			No	9	Vegetation Management and Inspections	
1	DRS	1	DRS-P-WMP_2025-Liberty-001	4	DRS-001-Q04	Q04. Regarding Liberty's Wood and Slash Management Target (WMP VM-VPM-01): a. On page 183 of its 2026-2028 WMP, Liberty states "[T]he vegetation management targets of 280 acres for each year: 2026, 2027, and 2028. On page 183, Liberty states, "Liberty has implemented a Fuel Management Program as a precautionary measure, where feasible, 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 280-acre annual wood and slash management target. The outline must include: i. The number of acres that will receive wood and slash management treatments only in areas where material was generated by Liberty's own vegetation management activities. ii. The number of acres that will receive wood and slash management treatments in areas where material was generated by others. iii. The number of acres that Liberty will perform additional fuel management work on and treat material that was not generated by Liberty's own vegetation management activities. b. Specify the diameter classes of woody vegetation to be treated under these activities and describe how each diameter class will be treated.	a. i. 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 management work occurs, Liberty calculates the acres 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 tree at a location, Liberty counts the acres for that location only once. Liberty has averaged about 3,350 tree removals per year since 2023 with 51% involving wood management post tree work. To determine its annual target, Liberty forecasts approximate acres treated based on the following assumptions: 1. Diameter classes of woody vegetation treated are as follows: • 6"-12.9" DBH • 13"-23.9" DBH • 24"-36" DBH • 36" +48" DBH • 48" DBH and greater b. Liberty is unable to forecast the number of acres treated for projects where vegetation material is not generated through its own vegetation management activities. However, Liberty actively develops and manages additional fuel management projects through defined scopes of work and detailed specifications. These projects are implemented in coordination with agency partners and landowners, with acreage calculated based on the specific project footprint. Liberty primarily takes on opportunistic approach, collaborating with local stakeholders 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. i. Liberty's diameter classes of woody vegetation treated are as follows: • 6"-12.9" DBH • 13"-23.9" DBH • 24"-36" DBH • 36" +48" DBH • 48" DBH and greater	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DRS-P-WMP_2025-Liberty-001.pdf			No	9	Vegetation Management and Inspections	
1	DRS	1	DRS-P-WMP_2025-Liberty-001	5	DRS-001-Q05	Q05. Regarding Extreme Event Scenarios: a. On page 63 of its 2026-2028 WMP, Liberty states that it is "assessing the ability of fire risk 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 any extreme scenarios into its risk modeling. b. On page 62 of Liberty's 2026-2028 Base WMP, 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 climate change being evaluated (e.g., 10-year forecast).	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 such 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://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DRS-P-WMP_2025-Liberty-001.pdf			No	5	Risk Methodology and Assessment	
1	DRS	1	DRS-P-WMP_2025-Liberty-001	6	DRS-001-Q06	Q06. Regarding Top Risk Circuits: a. On page 71 of its 2026-2028 WMP, Liberty discusses and provides its top risk-contributing circuits, shown in Table 5-6 Liberty Top Risk Circuits. a. Provide the total overall utility risk score used to calculate whether a circuit qualified as at least 1% of the total overall utility risk score represented within the table, as described on page 71. b. Provide the total number of circuits evaluated within Liberty's service territory.	a. 0.02659407 b. 60	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DRS-P-WMP_2025-Liberty-001.pdf			No	5	Risk Methodology and Assessment	
1	DRS	1	DRS-P-WMP_2025-Liberty-001	7	DRS-001-Q07	Q07. Regarding Risk Reduction for Top Circuits: a. Provide an updated version of Table 6-5 Summary of Risk Reduction for Top Circuits (Liberty's 2026-2028 WMP, pages 103-104) via Excel with the following additional columns: i. 2026 Grid Hardening Planned (circuit-mile); ii. 2027 Grid Hardening Planned (circuit-mile); iii. 2028 Grid Hardening Planned (circuit-mile); iv. 2026 Covered Conductor Planned (circuit-mile); v. 2027 Covered Conductor Planned (circuit-mile); vi. 2028 Covered Conductor Planned (circuit-mile); b. Identify whether "grid hardening" includes covered conductor for the circuit miles/pole provided.	a. Refer to attachment "Liberty Response_DR-001-Q07" b. Grid hardening refers to all WMP initiative activities 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 mileage (e.g., example targets include the number of line attachment removals, the number of pole replacements).	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DRS-P-WMP_2025-Liberty-001.pdf	1		No	5	Risk Methodology and Assessment	
2	DES	2	DES-P-WMP_2025-Liberty-002	1	DES-002-Q01	Regarding Liberty's Compliance Audit Program Objective and Sampling Statistics: On page 198 of its 2026-2028 Base WMP, Liberty states that "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. Provide a list of all Liberty's 2026-2028 Base WMP audits performed by a 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	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf			No	9	Vegetation Management and Inspections	
2	DES	2	DES-P-WMP_2025-Liberty-002	2	DES-002-Q02	Regarding Liberty's Compliance Audit Pass Rate Calculation: On page 200 of its 2026-2028 Base WMP, Liberty states "as described in Section 9.11.1, 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 in compliance 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-inspector work accuracy, tree crew work accuracy, etc.). i. If multiple criteria generate the Compliance Audit pass rate, explain how Liberty weights each criterion to calculate the pass rate.	Compliance Audit Criteria Regulation Within each span that has been evaluated from the sample size, the count of trees that have been pruned and/or trees that are expected to encroach into the regulated clearance distances within 3 years. Trees within Regulation Clearance Distance Count of trees that are located within regulated clearance distances (4' for 12kv - 60kV, 10' for 120kV) within the evaluated sample. Count of trees within regulation clearance distance during the compliance audit is measured against the total population of trees within the sample to determine the compliance rate.	Jessica McHale	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf			No	9	Vegetation Management and Inspections	
2	DES	2	DES-P-WMP_2025-Liberty-002	3	DES-002-Q03	Regarding Margin of Error and Confidence Level for Quality Control of Detailed Inspections: On page 201 of its 2026-2028 Base WMP, Liberty does not include a confidence level or 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: a. The confidence level; b. The MOE.	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	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf			No	9	Vegetation Management and Inspections	
2	DES	2	DES-P-WMP_2025-Liberty-002	4	DES-002-Q04	Regarding Quality Control Pass Rate Calculations: On pages 204-205 of its 2026-2028 Base WMP, Liberty lists multiple conditions that it averages to produce a final quality control pass rate for either a "single tree" or a "single pole." On page 201 of its 2026-2028 Base WMP, Liberty indicates that the "Population/Sample Unit" for its quality control audit of "Completed Tree Work" and "Detailed Inspections" is "Annual Circuit Miles." a. Describe how Liberty calculates the quality control pass rate at the "annual circuit mile" level (e.g., indicate if the pass rate target is the average of all individual tree or pole pass rates, if the target pass rate is the average of each circuit mile's individual pass rate, or describe Liberty's calculation using another method).	The pass rate is calculated as the average of all condition scores for the sample units evaluated within each QC work type. See Section 9.3.1.4, Table 9-2, 9-25, 9-26, 9-27, and 9-28 of Liberty's 2026-2028 WMP.	Jessica McHale	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf			No	9	Vegetation Management and Inspections	
2	DES	2	DES-P-WMP_2025-Liberty-002	5	DES-002-Q05	Regarding Workforce Relevant Educational Requirements: On page 210 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 roles. Liberty does not indicate that it has education requirements for any other positions. a. Does Liberty require relevant education for any positions other than Vegetation Management Supervisor and System Arborist/Forester (e.g., degrees in Forestry, Environmental Science, Natural Resources, Biology, etc.)? i. If yes, provide the relevant education requirements, indicate each position and the level of education Liberty requires. ii. 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	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf			No	9	Vegetation Management and Inspections	
2	DES	2	DES-P-WMP_2025-Liberty-002	6	DES-002-Q06	Regarding Eagle Rock Analytics Report: a. On page 5 of its Eagle Rock Analytics Report Improvement 11-23-18 "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." In Data Request DES-P-WMP_2024-LU-003 (Question 01), 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." a. 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	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf	2		No	Appendix D, Section 10	Areas for Continued Improvement, Situational Awareness and Forecasting	
2	DES	2	DES-P-WMP_2025-Liberty-002	7	DES-002-Q07	Regarding Risk Reduction Values Presented in Table 8-1: a. Some risk reduction values are presented as negative, implying an increase in risk within the service territory. i. Explain why the risk reduction values include a negative sign. ii. Or clarify why these values have a negative sign. b. All risk reductions percentages reported in Table 8-1 should be at a service territory level and should represent how much impact an activity has that year on its service territory. Are the risk reduction values reported in Table 8-1 calculated at a service territory level or circuit/segment level? c. Explain why the anticipated risk reduction for certain activities, such as covered conductor installation, appears to remain constant (e.g., 0.29) over multiple years despite varying annual circuit mile targets. d. Provide calculations in an Excel file of each calculated risk reduction per year and per activity.	a. i. 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 model. ii. The model, developed by Ermesan, 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 investment scenario. Negative values may occur when the investment 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. As a result, the average risk reduction may appear negative, even though the initiative does not increase risk. Instead, the model is indicating that the effect is not statistically distinguishable from zero. This is a known limitation of Monte Carlo-based models when applied to low-impact or high-variability interventions. Increasing the number of simulation iterations could reduce this variability, as the average risk values tend to converge with more run. b. The risk reduction values reported in Table 8-1 are calculated at a service territory level. c. Risk reduction was calculated and reported in Table 8-1 as a three-year average over the 2026-2028 Wildfire Mitigation Plan. d. 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 based of the Phase 3 Implementation of ORSIMYON Suite and WMP Support (2025) Final Report.	Jessica McHale	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf	1		No	5	Risk Methodology and Assessment	
2	DES	2	DES-P-WMP_2025-Liberty-002	8	DES-002-Q08	Regarding Traditional Overhead Hardening (WMP-GDOH-01): a. On page 182 of its 2026-2028 WMP, Liberty states that "Traditional overhead hardening typically includes installation of stronger poles, modern conductor, shorter spans, increased phase spacing, reduced sag, and hardware upgrades such as brackets, crossarms, insulators, fuses, and arresters." Additionally, in Table 8-1, Liberty's three-year target for its traditional overhead hardening activity is 5.3 circuit miles. a. Provide a complete description of the scope of work planned for the 5.3 circuit miles of this activity. i. What percentage of these miles will replace existing bare wire conductor? ii. Explain what "modern conductor" means, and how this conductor differs from the existing conductor being replaced. iii. Describe the difference between "traditional" and "covered" conductor, and explain why traditional conductor is better for covered conductor. b. Additionally, on page 214 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 less feasible." 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 ACI-12-23B-06 (Effectiveness of Sensitive Relay Profile ("SRP") and Traditional Hardening), Liberty noted "Normal Replacement Baseline" as a project (Appendix D, Table 2-2: Comparison of Risk Calculations). i. Explain how "Normal Replacement Baseline" is the same or different compared to traditional overhead hardening activity.	a. The 3.3 circuit miles of traditional overhead hardening planned will consist of targeted rebuilds of existing overhead electric distribution lines in high fire threat districts (HFTDs). The scope of work includes: • Replacement of aging or undersized poles with stronger poles rated for higher wind and loading conditions. • Replacement of aged, damaged, or inadequate hardware such as insulators, crossarms, brackets, fuses, and arresters. • Installation of modern conductor (ACSR) to replace aging conductor • Shortening of spans, where feasible, to reduce mechanical stress and potential conductor slap. • Increasing phase spacing and reducing sag to minimize the potential for line-to-line contact or conductor-to-vegetation interactions. • Use of "modern" refers to the application of improving mechanical strength and electrical reliability in areas where more advanced mitigation strategies (e.g., covered conductor or undergrounding) are constrained by terrain, environmental, or economic considerations. Approximately 90-100% of the 3.3 circuit miles will involve the replacement of existing bare wire conductor. Traditional overhead hardening efforts under this initiative are generally tied to full-line segment rebuilds, which include the removal of existing bare wire and installation of modern alternatives. b. "Modern conductor" refers to bare wire conductor that meets current electrical and mechanical standards for strength, ampacity, and durability. Liberty's standard is ACSR. Bare wire remains a viable option in many rural and high-fire threat areas where it performs reliably under local conditions and is installed in accordance with utility standards and guidelines mandated by NESC, and standard spacing requirements still apply. In contrast, "modern conductor" refers to Covered Conductor (CC), which offers better resilience against environmental stressors such as wildlife interactions, vegetation contact, and weather-related hazards. Liberty uses both options, depending on site conditions. b. i. Covered conductor is typically used in dense forest areas where it's not feasible to widen crossarms or install poles, due to environmental constraints, such as steep terrain, limited access, or hard granite. In these areas, the added pocket on covered conductor helps reduce ignition risk from vegetation contact or wire clap. If there is space to widen crossarms and safely install poles, Liberty uses traditional overhead hardening with modern bare conductor. This approach offers similar risk reduction as covered conductor but is more efficient to install and more cost effective. c. i. The Normal Replacement Baseline is part of Liberty's broader resiliency program and refers to isolated pole and equipment replacements driven by asset condition assessments or inspections. These are typically reactive or maintenance-driven and do not include full line rebuilds. In contrast, Traditional Overhead Hardening consists of planned projects that target specific high fire-risk areas identified through Liberty's risk analysis. These projects involve replacing conductor identified as needing replacement, along with structural upgrades such as pole replacements, reconductoring, crossarm widening, and hardware replacement.	Jessica McHale	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf			No	8	Grid Design, Operations, and Maintenance	
2	DES	2	DES-P-WMP_2025-Liberty-002	9	DES-002-Q09	Regarding Emerging Grid Hardening Technology Installations and Pilot Progress: On page 175 of its 2026-2028 Base WMP, Liberty states that it "is not currently piloting additional grid hardening technologies and at this time does not have new emerging technologies to report in its 2026-2028 WMP." a. What additional grid hardening technologies, if any, were considered for piloting and why did Liberty decide not to pursue them for piloting?	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 peers, cost-effective technologies.	Jessica McHale	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf			No	8	Grid Design, Operations, and Maintenance	
2	DES	2	DES-P-WMP_2025-Liberty-002	10	DES-002-Q10	On page 118 of its 2026-2028 Base WMP, Liberty states that "when a conductor is covered, it is assumed that the Probability of Ignition (POI) calculated by Technosylva is reduced to account for the effectiveness of the mitigation strategy. For example, if a conductor is covered, and the POI calculated by Technosylva is 10%, the effective POI for that conductor is reduced by 50% based on the assumed effectiveness of the activity." On page 119 of its 2026-2028 Base WMP, Liberty provides cause-specific reductions used in the model (i.e. "60% reduction in conductor-related failures," "10% reduction in lightning-related failures," etc.). a. How was the 50% POI reduction determined? i. Provide an explanation and documentation to support this reduction percentage. i.e. "70% reduction in animal-related failures" ii. "75% reduction in tree-related failures" iii. "10% reduction in lightning" b. Explain how each of the following cause-specific reductions were determined. For each reduction percentage listed below, provide explanations and documentation to support these figures: i. "60% reduction in conductor-related failures" ii. "10% reduction in lightning-related failures" iii. "75% reduction in vegetation-related failures"	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. This assumption reflects a conservative estimate of mitigation effectiveness, consistent with findings from the Joint IOU Covered Conductor Effectiveness Workstream, which included lab testing, field data, and SME input. Additional supporting references include: • Electric Power Research Institute Mitigation Solution • Edison: Insulated Wires Help Reduce Wildfire Risk • Mesmon Utility: Wildfire Mitigation with Aerial Covered Conductor • KT Hasegan: High Voltage Lab – Covered Conductor Behavior While some sources suggest higher ignition reduction potential, Liberty selected a conservative 50% reduction to avoid overestimating mitigation benefits in its risk model. b. The explanations and documentation to support each of the reductions listed are provided in Section 8.1, Annex 1: Conductor Failure model and vegetation of the Phase 3 Implementation of ORSIMYON Suite and WMP Support (2025) Final Report.	Jessica McHale	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf			No	8	Grid Design, Operations, and Maintenance	
2	DES	2	DES-P-WMP_2025-Liberty-002	11	DES-002-Q11	Regarding Fire Risk Maps: On pages 68-69 of its 2026-2028 Base WMP, Liberty provided figures 5-4 and 5-5 showing Fire Risk Maps. a. Provide higher quality and high-resolution files as a PDF for figures 5-4 and 5-5 that clearly show the differentiated sections on the maps. b. Provide the following Fire Risk Map shapefiles/geodatabase layers: 2021, 2022, 2023, 2024	Refer to attachment "Liberty Response_DR-002-Q11"	Jessica McHale	7/3/2025	7/9/2025	7/9/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-002.pdf	1		No	5	Risk Methodology and Assessment	
3	DES	3	DES-P-WMP_2025-Liberty-003	1	DES-003-Q01	Regarding Annual Utility Risk: On page 61 of Liberty's 2026-2028 Base WMP, and page 7 of the Ormeson report (Attachment B1), there are two figures depicting the components of total Utility Risk. a. Explain why Figure 5-2: RBDM Framework (Liberty's Base 2026-2028 WMP, page 41) includes an additional "Asset Failure Risk" while the Utility Risk Calculation in Section 5.2.2.3 (Liberty's Base 2026-2028 WMP, page 49) does not include that risk. b. Explain why Figure 5-2: RBDM Framework (Liberty's Base 2026-2028 WMP, page 41) and Figure 3: Overview of the Risk Framework for Liberty Utilities in ORSIMYON (Attachment B1, Ormeson Report, page 7) seem to be depicting different processes. i. Describe the differences depicted, and why such differences exist. ii. Which figure more accurately depicts Liberty's risk modeling framework?	a. Figure 5-2 presents a conceptual overview of the Risk Based Decision-Making Framework, which includes Asset Failure Risk, Fire Risk, and PSPS Risk. Section 5.2.2.3 defines Utility Risk as the average of Fire Risk and PSPS Risk. Asset Failure Risk is not included in the utility risk formula, because its effects are already embedded in the components of Fire Risk and PSPS Risk. Asset Failure Risk is a supporting diagnostic tool, used to identify and prioritize mitigations that reduce Fire Risk or PSPS Risk. b. Figure 5-2 is broader and is a depiction of how Asset Failure Risk is a supporting diagnostic tool. Asset Failure Risk is used to support decision-making for identifying and prioritizing mitigations that reduce Fire Risk or PSPS Risk. The figure in the ORSIMYON Report is focused on the simulation logic, where Asset Failure Risk is not a standalone output but a driver of failure probabilities. i. Asset Failure Risk is a foundational input, not a final output in the Utility Risk formula. The two figures reflect different layers of the same framework. Figure 5-2 of the WMP is a strategic overview outlining the full RBDM Framework. Figure 3 of the ORSIMYON Report is more precise when considering computational modeling and simulation logic. ii. Both figures are accurate, but for different purposes. Figure 5-2 of the WMP is more accurate for understanding the full strategic framework, including how Asset Failure Risk informs mitigation planning. Figure 3 of the ORSIMYON Report is more accurate for understanding the computational model used to generate risk scores.	Jessica McHale	7/8/2025	7/11/2024	7/16/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-003.pdf	3		No	5	Risk Methodology and Assessment	
3	DES	3	DES-P-WMP_2025-Liberty-003	2	DES-003-Q02	Regarding Probability of Ignition: a. On page 61 of Liberty's 2026-2028 Base WMP, POI is noted as synonymous with "burn likelihood" and "BL," which Energy Safety assumes stands for Wildfire Likelihood. However, on page 64 of Liberty's 2026-2028 Base WMP, the BL row of the table says the Probability of Ignition is an input. On page 63 of Liberty's 2026-2028 Base WMP, the "Probability of Fire" (POF) is equated with "BL," which Energy Safety assumes stands for Wildfire Consequence. a. Provide clarification on the difference between POI and BL, as used in Liberty's WMP. b. Clarify if the POI calculated by Technosylva is derived from the APP (probability of asset failure) and weather sampling from Technosylva (mentioned in the Ormeson report, Appendix B1, page 21). c. Describe why scoring of the POP (formula from Liberty's 2026-2028 Base WMP, page 44) is based on the 80th percentile of the POP.	a. Probability of Ignition (POI) is derived from Technosylva Firelight. POI represents the likelihood that an ignition source, such as a felled asset, will result in a fire requiring suppression. It is a static metric calculated at specific ignition points. It does not account for asset failure likelihood or system-level impacts. Asset failure likelihood is not incorporated into POI as an input to the BL module. BL also incorporates condition modifiers to produce a refined asset-specific version of POI that is adjusted for asset condition and status of mitigation actions. b. The POI from Technosylva is not derived from Probability of Asset Failure c. The scaling of POP is based on the 80th percentile of POP to increase the sample size of events that could occur. Liberty made the decision to make the risk model less risk-averse to show POP 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	7/11/2024	7/16/2025	https://California.libertyutilities.com/uploads/5.0/en/h2/Responses%20to%20DRS%20Data%20Request%20-%20DES-P-WMP_2025-Liberty-003.pdf			No	5	Risk Methodology and Assessment	
3	DES	3	DES-P-WMP_2025-Liberty-003	4	DES-003-Q04	Regarding SRP: a. On page 5 of Liberty's 2026-2028 Base WMP, the 2024 target for SRP implementation in the HFRAs is listed as 100%. SRP is not currently included

6	CPUC - SPD	6	SPD-LB-WMP2026-001	2	SPD-001-Q02	Provide an explanation of how Liberty calculated the three Activity Effectiveness (i.e. Overall Risk, Wildfire Risk and Outage Program Risk) values in Table 6-4: a. Provide a detailed step-by-step explanation of how Liberty calculated these three values for: i. Underground cable replacements ii. Equipment settings to reduce wildfire risk iii. Expulsion fuse replacement iv. Distribution pole replacements and reinforcements v. Undergrounding of electric lines and/or equipment vi. Weather station installations b. Provide all supporting workpapers that Liberty used to arrive at the 18 values calculated in response to Question 2a. c. Explain why undergrounding exhibits a positive activity effectiveness for wildfire risk. d. Explain why covered conductor exhibits a positive activity effectiveness for outage program risk.	a. All the Activities are calculated the same. The differential average aggregated risk score of each scenario ran based on the budget amount. Baseline Risk - Scenario Risk) / Baseline Risk= Activity Effectiveness b. Refer to attachment: "Liberty Response_DR-SPD-001-Q2.x." c. Expulsive activity effectiveness of wildfire risk is shown due to the small amount of work being conducted in terms of the entire network. Therefore, the risk reduction effects of undergrounding are not noticeable at the system level until a point in time where enough underground has been done to influence the overall wildfire risk of the system. Expulsive activity effectiveness of outage program risk is shown due to the small amount of work being conducted in terms of the entire network. Therefore, the risk reduction effects of covered conductor are not noticeable at the system level until a point in time where enough covered conductor has been done to influence the overall wildfire risk of the system.	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf	1		No	6	Wildfire Mitigation Strategy Development	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	3	SPD-001-Q03	In response to Area of Continued Improvement (AOCI) in 23-06-055, Liberty argues that "Traditional overhead hardening in combination with SPP provides the best Risk Spend Efficiency when compared to covered conductor and underground." a. In Table 1-2 of AC-1 23-06-055, explain how the "Benefit" field was calculated. b. Explain why does Table 1-2 presents "Benefit", but Table 1-3 in AC1-Q1-25-04 presents "Benefit (%) Cost (Million $)". c. Provide indicators that traditional hardening in combination with System Relay Profile (SRP) provides the highest benefit of any mitigation. Table 8-1 states that Liberty will be doing 3.3 miles of traditional hardening. How many of these 3.3 miles will also be enabled with SRP? d. Table 8-1 states that "Traditional hardening is nearly three times less than was targeted during the 2023-2025 WMP (9.3 miles). Considering that traditional hardening in combination with SRP provides the highest benefit, why has Liberty reduced traditional hardening in its 2026-2028 Base WMP?	a. Benefit is calculated as (Percent Difference in Fire Risk)/(Total Budget/1000000) b. Both tables show benefit as risk impact per million dollars spent. c. Yes, it does. d. Liberty's targets best represent an optimized plan given available resources. Doing more pole replacements and other targeted grid hardening initiatives, as opposed to full line rebuilds, addresses more risk across a broader portion of the system. This approach reflects the best available information and resource allocation at the time of establishing the target.	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf			No		Appendix D	Areas for Continued Improvement	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	4	SPD-001-Q04	Table 8-1 of the 2026-2028 Base WMP states that Liberty is targeting 1,000 distribution pole replacements and reinforcements. This 2026-2028 target is approximately 200 more poles than was targeted in the 2023-2025 WMP. Why has Liberty increased distribution pole replacements and reinforcements in its 2026-2028 Base WMP?	Liberty has increased its target for distribution pole replacements and reinforcements in the 2026-2028 WMP based on updated risk modeling, asset condition data, and a strategy based on cost-effective, targeted hardening. The targets best represent an optimized plan given available resources.	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf			No	8	Grid Design, Operations, and Maintenance	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	5	SPD-001-Q05	Liberty estimates that the reliability impact of the PSPS risk is equivalent to 4.234 million Customer Minutes of Interruption (CMI). The two formulas used to arrive at this value CMI=PSPS Consequence Reliability and Customer Count-Interruption * Average PSPS Duration (Minutes) CMI. a. Write first formula, explain what is meant by PSPS Consequence Reliability. b. Explain why Liberty uses the average PSPS duration in minutes. c. In the second formula, explain how Liberty calculated Average PSPS Duration (Minutes). d. Provide all datasets used to arrive at the calculation of a 234 million CMI.	a. Consequence Reliability is the reliability impact of a PSPS event based on CMI during a PSPS event. b. Interpretation means the impacted customer count to the model. c. The average PSPS duration minutes is based on historical PSPS event durations and SME input. d. The 4.234 million CMI is an example of the model producing a consequence score offering 3,517 customers for 1,276 minutes. The data to provide this is created from the risk model and is not an input to the model. Due to the stochastic nature of the model, this is one of many possible outputs of iterations from a simulation. Since this metric is an output of the model, the input data does not directly correlate with input datasets.	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf			No	5	Risk Methodology and Assessment	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	6	SPD-001-Q06	On page 4 of the 2026-2028 Base WMP, Liberty estimates that the financial impact of each customer minute interrupted due to PSPS at $0.17/CMI. a. Explain how does Liberty arrive at this value of $0.17/CMI. b. Provide all datasets and workpapers that support this valuation.	a. Liberty's valuation of $0.17 per Customer Minute Interrupted ("CMI") for PSPS events is based on its financial consequence modeling developed in collaboration with Arup. This figure reflects a blended value of Lost Load ("VoLL") estimate for regular customers and aligns with assumptions used in Liberty's MAIF and financial models. It is consistent with industry benchmarks and is used to quantify the economic impact of PSPS events in Liberty's risk-spend efficiency and cost-benefit analyses. b. Refer to attachment: "Liberty Response_Arup_DR-SPD-001-Q6."	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf	1		No	5	Risk Methodology and Assessment	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	7	SPD-001-Q07	On page 4B, Liberty also estimates that the financial impact of each customer minute interrupted due to SRP at $0.17/CMI. a. Does Liberty use the same method to estimate to estimate the financial impact of SRP as it does for PSPS (see Question 6a.)? b. If so, explain why. c. If not, explain how the methods differ and provide all datasets and workpapers that were used to support the valuation of financial impact for SRP.	a. No. b. Liberty does not use the same methodology for estimating the financial impact of SRP as it does for PSPS (see Question 6a.)? c. N/A	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf			No	5	Risk Methodology and Assessment	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	8	SPD-001-Q08	Provide the datasets that were used to create Table 6-1. This must be presented at the circuit segment level for all four circuits found in Table 6-1. This should include the following variables based on Figure 5-2: a. Overall Utility Risk b. Ignition Risk c. Probability of Fire d. Probability of Ignition e. Probability of Asset Failure f. Probability Outage g. Consequence Risk h. Population Impact i. Acres burned j. Buildings Destroyed k. PSPS Risk l. Customers Impacted m. Probability of High Wind Gusts n. Probability of High PFM in SRP Availability o. PSPS Consequence p. Safety q. Reliability r. Financial	Refer to attachment: "Liberty Response_DR-SPD-001-Q8.xlsx"	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf	1		No	6	Wildfire Mitigation Strategy Development	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	9	SPD-001-Q09	On page 8B of the 2026-2028 Base WMP, Liberty notes that Table 6-1 includes circuits contributing greater than or equal to 1% of Overall Utility Risk. According to Liberty's Quarterly Data Reports, the TWT200 circuit is in HFTD Tier 2 and represents about 0.42% (78.8 miles) of Liberty's grid. SPD calculated that this circuit experienced 2.4 unplanned outages, representing over 3.34% CMI in 2024 and the first 3 months of 2025 (15 months total). a. Explain how Liberty determined that TWT200 exhibits no wildfire ignition risk or outage program 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 TWT200.	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf			No	6	Wildfire Mitigation Strategy Development	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	10	SPD-001-Q10	On page 9 of the 2026-2028 Base WMP, Liberty states that "Overall Utility Risk = Ignition Risk * (1-Asset Failure Risk) * (1-Outage Program Risk)". a. Explain why Liberty divides the sum of PSPS Risk and Fire Risk by two ("/ 2") is calculated using the formula: (PSPS Risk + Fire Risk)/2 = UR. b. Explain why Liberty omits 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. Does Asset Failure Risk contribute to the calculation of Utility Risk? e. If not, explain why. f. If not, explain why not.	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 disproportionally influencing the final score. b. Outage Program Risk is a separate module of risk that is brought into PSPS Risk as well. 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 disproportionally influencing the final score. d. The Probability of Asset Failure is brought into Wildfire Likelihood which falls under the Fire Risk Module. e. N/A f. Figure 5-2 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 components of Fire Risk. Asset Failure Risk is a supporting diagnostic tool, used to identify and prioritize mitigations that reduce Utility Risk. Figure 5-2 is a broader depiction of how Asset Failure Risk informs decision making. The formula for utility risk more accurately reflects the computational model used to generate risk scores.	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf			No	5	Risk Methodology and Assessment	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	11	SPD-001-Q11	In response to ML-Q1-25-06, Liberty states that it conducted 1 mile of field wing-drone infrared inspections on its transmission assets. a. Provide data of exactly where these inspections happened, and include the following: i. Circuit Segment ID ii. Circuit ID iii. Latitude iv. Longitude v. Date vi. Boss b. Explain why Liberty does not plan to conduct additional infrared inspections during the 2026-2028 WMP cycle.	1. Circuit Segment ID (1123640, (2) 2282413 & (3) 291034 2. Circuit ID 640 & 167 3. Latitude (1) 38.954584, (2) 38.954934, (3)39.281760, 4. Longitude (1) -122.768700, (2) -119.938450, (3) -120.109919 5. Date -11/29/2023 6. Cost -$17,580 7. Liberty did not include this task as a planned event in the 2026-2028 WMP due to the updated GO165 Detail and Patrol inspection procedures. Liberty purchased an IR camera in 2024 to update its internal drone program. In the event there are concerns of overheating, this technology will be included in the detailed inspection of the 120kv pot heads or a standalone maintenance activity for structures supporting 120kv pot heads.	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf			No	8	Grid Design, Operations, and Maintenance	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	12	SPD-001-Q12	Provide a copy of Liberty's procedures/checklists/for conducting detailed inspections of distribution electric lines and equipment (WMP-GDOM-N-01) and patrol inspections of distribution electric lines and equipment (WMP-GDOM-N-03).	Attachment Condition Code Checklist: •Clearance •Conductor Issue •Crossarm Needs Cutting Off •Crossarm Needs Replacing •Foreign Objects on Poles •Ground Wire Damaged/Missing •Ground Molding Damaged/Missing •Guy Wire Damaged/Loose •Hardware Issue •High Voltage Sign Problem •Idle Hardware •Lid/Door Inoperable •Lightning Arrester Replacing •Missing Bolt Covers •Oil Leaks •Tagging/Labels •Underground Inaccessible •Work Space/Climbing Space •Equipment Arm Patrol Condition Code Checklist: •Conductor Issue, Crossarm Needs Replacing •Insul/Guards Broken/Loose •Pole Need Replacing •Oil Leaks •Work Space/Climbing Space •Equipment Arm	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf			No	8	Grid Design, Operations, and Maintenance	
6	CPUC - SPD	6	SPD-LB-WMP2026-001	13	SPD-001-Q13	Provide a dataset of all detailed inspections of distribution electric lines and equipment (WMP-GDOM-N-01) and patrol inspections of distribution electric lines and equipment (WMP-GDOM-N-03) that were conducted from 2023-2025. The dataset at a minimum must include: a. Inspection ID b. Circuit Segment ID c. Circuit ID d. Voltage e. Start Point Latitude f. Start Point Longitude g. End Point Latitude h. End Point Longitude i. Date j. Cost k. Work Item Findings	Refer to attachment: "Liberty Response_DR-SPD-001-Q13.""	Kwamanto Lanor	7/11/2025	7/17/2025	7/17/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DSPD-LB-WMP2026-001.pdf	1		No	8	Grid Design, Operations, and Maintenance	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	1	OEIS-006-Q01	Liberty expects negative or statistically non-significant risk reduction values for most activities in Table B-1. Liberty states that these values "[indicate] that the effect is not statistically distinguishable from zero." Furthermore, Liberty states that "[the] model is highly sensitive to the number of simulation iterations. The number of iterations in Liberty's model must be large enough to ensure the effect is not statistically significant within the model's variability. Increasing the number of simulation iterations could reduce this variability, as the average risk values tend to converge with more runs." a. Provide a detailed explanation of why Liberty did not increase the number of simulation iterations in its model to address the non-significant risk reduction values. b. What quality assurance or validation steps did Liberty take to calibrate the Dinesque model outputs against the following: i. Historical wildfire ignitions ii. Wildfire mitigation effectiveness iii. PSPS events iv. operational performance data v. peer utilities	a. More stochastic modeling iterations would increase the processing time and expense while not changing the results of the model, only resulting in less variation between the minimum and maximum values without changing the mean. b. Liberty responds as follows: i. Dinesque uses Monte Carlo Simulation. Technique uses a wide range of data available to them and performs their own validation and quality assurance. This data is used widely in the industry. ii. Dinesque performs industry research and gathers SME input when creating the models and associated outputs. iii. Standard industry weather is used to model potential future PSPS events, and the results are checked against historic PSPS events. iv. Liberty considers specific utility asset data as inputs to the model. In a combined effort, Liberty and Dinesque validate the input data and associate the decision trees to real life situations through SME validations. Liberty is currently working on a process to validate the outputs. v. Liberty participates in the risk modeling working group, the joint mitigation effectiveness working group, and attends electric utility weather and analytics summits each year.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf			No	5	Risk Methodology and Assessment	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	2	OEIS-006-Q02	Liberty claims a 73.7% wildfire risk reduction from SRP implementation in Table 6-1 of its 2026-2028 WMP. a. Provide a detailed explanation of how this value was derived, including modeling assumptions, variables, and validation steps. b. Was this value validated with historical performance data or peer utility benchmarks? c. Provide a detailed explanation of how Liberty determined that SRP provides a 73.7% wildfire risk reduction effectiveness for SRP implementation? i. Provide a detailed explanation of how the effectiveness of SRP implementation was derived, including modeling assumptions, variables, and validation steps. ii. Was this value validated with historical performance data or peer utility benchmarks?	Modeling Assumptions: Refer to sections 2.1 and 2.2.2 of Appendix B, Attachment 1 of Liberty's 2026-2028 WMP "Dinesque report" for more details on calculation. The value of 73.7% represents reduction in utility risk, which is an average of "PSPS Risk" and "Fire Risk." • SRP has a significant effect in reducing both PSPS and Outage risk (approximately 9% for outage program risk). • There is not normalization between PSPS Risk and Fire Risk in the Utility Risk calculation. • Outage risk is 0.0000 for the Baseline and 0.0000 for SRP, PSPS risk is approximately 0.0015 while fire risk is approximately 0.000017586. • SRP risk is not included in Utility Risk, which would explain the outcome. Liberty can include Outage Program Risk in the Utility Risk calculation, which would capture the risk from SRP outages in the Utility Risk calculation as well. For derivation, validation, and variables, refer to part c. below. b. No, OMF does not have access to that data. c. 1. SIMs from 2015 to 2020. 2. Dinesque Report: Refer to sections 2.2.1 and 2.2.2 of the Dinesque report for more details on calculation. OMF assumes that when SRP is enabled, it will be triggered when a failure happens. If Liberty enables SRP for 14 days, during these 14 days, if an asset fails, SRP will trigger an outage for the whole circuit. Additional assumptions: • No complete circuit is affected, not just a section of it. • All assets have a POF of 0. This value could be modified for future simulations based on feedback. • The PoF value derived: To calculate the effectiveness of SRP, OMF compares the average risk over the years of a simulation Baseline (assuming SRP is enabled) and another simulation (assuming SRP is disabled). See Dinesque report section 3.2. Validation Steps: OMF validates the calculation inside its application to confirm that the arithmetic is working correctly. Validation of business logic is based on Liberty's SME review. For derivation, refer to sections 2.2.1 and 2.2.2 of the Dinesque report for details on calculation. The main variables are: • Probability of failure of all assets impact the probability of triggering SRP event • All Technique data will affect the consequences impact and the probability of ignition The Dinesque report details the data and all assumptions taken into the consequence calculation b. No. OMF doesn't have access to these numbers.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf	1		No	5, 8	Risk Methodology and Assessment, Grid Design, Operations, and Maintenance	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	3	OEIS-006-Q03	In Section 8.2 of Liberty's 2026-2028 WMP, Liberty provides a series of bullets reporting "Fire Risk Scores" for various grid hardening initiatives. However, the WMP does not clearly define how these "Fire Risk Scores" are derived, what they represent quantitatively, or how they relate to the utility's overall wildfire risk modeling framework described in Appendix B (Dinesque) and Section 5. a. Describe the methodology used to calculate these Fire Risk Scores. b. Are these Fire Risk Scores tied directly to the outputs of Liberty's wildfire risk model (e.g., probability × consequence), or are they independently assigned for planning purposes? i. If independent, explain how these scores are validated or calibrated against Liberty's broader risk modeling framework. c. Provide any supporting documentation, internal guidance, or data dictionaries used to develop or interpret the Fire Risk Scores.	a. Fire Risk scores are derived from the Fire Risk calculations in Section 5 of Liberty's 2026-2028 WMP. Fire Risk Score are calculated through the use of a stochastic model. This model runs simulations based on particular mitigation inputs. b. The outputs are tied to Liberty's wildfire risk score model by calculating the benefit of a mitigation related to Liberty's baseline risk score. c. Refer to Liberty's response to question 9 Regarding the Dinesque report's associated documents.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf	1		No	5, 8	Risk Methodology and Assessment, Grid Design, Operations, and Maintenance	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	4	OEIS-006-Q04	Provide the number of distribution and transmission miles broken down by HFTD Tier 2 and HFTD Tier 3, in the table below, that will remain unhardened by the end of 2026. (See request for table template)	See response for tables.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf			No	4, 8	Overview of Service Territory, Grid Design, Operations, and Maintenance	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	5	OEIS-006-Q05	Liberty's scope of work for traditional overhead hardening includes replacing the existing bare wire with a new bare conductor, and it states that "this approach offers similar risk reduction as covered conductor but is more efficient to install and more cost effective." However, in Section 8.2.1 of its WMP, Liberty states that it "did not simulate a scenario in its risk model for traditional overhead hardening" it even though Liberty states that its "risk model is now operational, [and] projects can be analyzed with multiple initiatives at the circuit/circuit segment level to calculate impact of traditional overhead hardening projects on wildfire risk." a. Provide supporting documents and calculations that render similar risk reduction when hardening a circuit with new bare conductor compared to covered conductor. b. Explain why Liberty did not simulate a scenario in its risk model for traditional overhead hardening. c. How did Liberty determine its circuit miles target for this activity if it did not simulate a scenario in its risk model? i. What method did Liberty use to determine its target? ii. If it was determined through subject matter expert (SME) input, provide a list of supporting documents and assumptions.	a. Refer to attachment: "Liberty Response_DR-006-Q05.pdf." This document provides comparisons of utility risk, fire risk, and outage program risk between two projects: covered conductor (Scenario 14919) and traditional overhead hardening (Scenario 14902). The Mean Difference percentage of each scenario renders similar risk reduction results. b. Liberty did not simulate a scenario in its risk model for traditional overhead hardening because when Liberty began developing scenarios to simulate in its risk model, the target for traditional overhead hardening was zero. This target changed prior to finalizing the 2026-2028 WMP. Liberty did not have the opportunity to adequately model the scenario in the risk model prior to the submission of the WMP. c. Liberty's target represents an optimized plan given available resources and reflects the best available information and resource allocation at the time of establishing the target. i. The target was developed using Subject Matter Expert input and supporting documents and assumptions. Supporting documents include: a. Appendix B – Ll-1398-06: Discussion of traditional hardening effectiveness and comparison to other mitigations. Dinesque Phase 1 Report: Provides context for prioritization of initiatives, even though traditional hardening was not directly simulated. Asset Condition Assessments: Field inspection data and maintenance records. Engineering Standards and Design Criteria: Used to identify segments suitable for overhead rebuild projects. Budgeting and Work Plan Records: Projects are selected based on feasibility of implementation, including permitting timelines, environmental constraints, and construction readiness. Budgeting and Historical Completion Records: Used to develop scenarios in Dinesque.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf	1		No	5, 8	Risk Methodology and Assessment, Grid Design, Operations, and Maintenance	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	6	OEIS-006-Q06	On page 135 of Liberty's 2026-2028 WMP, Liberty states that it "considers the use of microgrids as an alternative in all applicable projects and has experienced success with Liberty's Sagehen microgrid."	Liberty does not have any planned microgrid projects for the 2026-2028 WMP cycle and therefore does not have findings on possible microgrid locations within its service territory.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf			No	8	Grid Design, Operations, and Maintenance	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	7	OEIS-006-Q07	On page 135 of Liberty's 2026-2028 WMP, Liberty states that "it is assumed that 25% of the network consists of grey wire." a. Explain how this assumption was derived. b. Explain how Liberty conducted a system inventory or sampling effort to verify this assumption. i. If Liberty has not conducted a system inventory or sampling effort to verify this, please describe Liberty's plan to validate this assumption.	a. Liberty's (I&E) have an estimation of the amount of grey wire in the system. b. Liberty's efforts to conduct a system inventory to gather the amount data about the system was not specifically directed at acquiring information about secondary wire. Liberty captures the grey wire that is replaced in the system through the inspection application. At this time, there is effort planned to perform a field survey to validate this assumption.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf			No	8	Grid Design, Operations, and Maintenance	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	8	OEIS-006-Q08	On page 3B of Attachment B1 in its 2026-2028 WMP, Liberty states that "the replacement cost for a tree attachment is set at $18,000, based on the average cost outlined in the initiative document, which reports a total cost of $1,100,000 for 60 attachments." a. Provide a detailed breakdown of this cost estimate, including but not limited to labor, equipment, materials, and overhead. b. How does Liberty ensure this unit cost is reasonable and in line with peer utilities?	a. Refer to the table below for a breakdown of the cost estimate for basic tree attachment removal. There may be variation in cost components depending on the complexity of an individual project. The average cost reported in Liberty's 2026-2028 WMP was derived from averaging historical cost data, not from a project level estimate. See Response for table b. The average cost reported in Liberty's 2026-2028 WMP was derived from averaging historical cost data, and not from a project level estimate. Liberty does not benchmark these specific costs against those of peer utilities.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf			No	5, 8	Risk Methodology and Assessment, Grid Design, Operations, and Maintenance	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	9	OEIS-006-Q09	In Section 8.2 of Liberty's 2026-2028 WMP, Liberty provides a series of bullets reporting "Fire Risk Scores" for various grid hardening initiatives. However, the WMP does not clearly define how these "Fire Risk Scores" are derived, what they represent quantitatively, or how they relate to the utility's overall wildfire risk modeling framework described in Appendix B (Dinesque) and Section 5. a. 2025-2028 WMP Targets and Budgets.xlsx (in Excel format) b. comparisons_fire_score.pdf c. comparisons_outage_program_risk.pdf d. comparisons_utility_risk.pdf	Refer to attachment: "Liberty Response_DR-006-Q09.1.xlsx" for the excel file "2026-2028 WMP Targets and Budgets." referenced in Liberty's WMP. Refer to attachment: "Liberty Response_DR-006-Q09.2.pdf" for the "comparisons fire score," "comparisons outage program risk," and "comparisons utility risk" files referenced in Liberty's WMP.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf	2		No	5	Risk Methodology and Assessment	
7	OEIS	7	OEIS-P-WMP_2025-Liberty-006	10	OEIS-006-Q10	In Liberty's 2026-2028 Base WMP, Figure 6-2 shows the Projected Overall Service Territory Risk. a. Explain how Liberty calculated the risk shown in this figure, including why Liberty took that approach. b. Explain why the risk increases between some of the years within this figure. c. Describe how Liberty validated the risk model output when generating this figure.	a. In conjunction with Dinesque, Liberty utilizes a stochastic modeling approach to calculate and attribute risk in the model. Liberty utilizes this approach so that a variety of causes and outcomes would be accounted for in its risk analysis. b. The variations in risk between some of the years is attributable to the stochastic approach as it captures different outcomes for each iteration of a simulation. c. Liberty and industry research and SME inputs to validate the model approach. Liberty is working towards being able to validate outputs more frequently to further the enhancement and development of its modeling capabilities.	Jessica McHale	7/18/2025	7/23/2025	7/25/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-006.pdf			No	6	Wildfire Mitigation Strategy Development	
8	OEIS	8	OEIS-P-WMP_2025-Liberty-007	1	OEIS-007-Q01	On pages 256-257 of its 2026-2028 Base WMP, Liberty refers to actions being taken during or after "significant events" or involving a "significant number of customers." but the term "significant" is not defined. a. Define "significant events" as used in this context. b. Define "significant number of customers" as used in this context.	1. On page 257 of Liberty's 2026-2028 Base WMP, Liberty states: "City and county officials, OEI officers, critical infrastructure, CPUC, and agency partners will receive the earliest notifications of a "significant" planned or potentially planned outage, up to eight days in advance, when possible." In this context, significant is not defined by specific thresholds. Liberty's customer team determines if an outage requires communication with city and county officials and agency partners, based on factors including the number of customers impacted, outage duration, and potential customer support needs (e.g., warming centers during winter storms). 2. On page 256 of Liberty's 2026-2028 Base WMP, Liberty states: "During a major outage or emergency that affects a significant number of customers, an email is sent to personnel, agencies, and media to provide information, detail, and status updates. Depending on the situation, the notification may include information on the affected area, estimated restoration time, and customer support options."For outage or emergency requires communication to agency partners and the media, based on factors including outage duration, potential customer support needs, and regulatory requirements (e.g. Public Safety Power Shutoff events).	Jessica McHale	7/25/2025	7/30/2025	7/30/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-007.pdf			No	11	Emergency Preparedness, Collaboration, and Public Awareness	
8	OEIS	8	OEIS-P-WMP_2025-Liberty-007	2	OEIS-007-Q02	a. On page 245 of its 2026-2028 Base WMP, Liberty refers to a "Corporate Emergency Management Plan." Provide a copy of Liberty's Corporate Emergency Management Plan.	Refer to attachment "Liberty Response_DR-007-Q02.pdf"	Jessica McHale	7/25/2025	7/30/2025	7/30/2025	https://cpuc.sharepoint.com/sites/ed5.0/SearchQ?Response%2D%2D0%2D%2D%2D%2D-%2DOEIS-P-WMP_2025-Liberty-007.pdf	1		No	11	Emergency Preparedness, Collaboration, and Public Awareness	
8	OEIS	8	OEIS-P-WMP_2025-Liberty-007	3	OEIS-007-Q03	On page 255 of its 2026-2028 Base WMP, Liberty states that its "plan to restore customers during emergencies is described in Section 11.2.1. " Upon review, this section does not include such detail. Provide a detailed description of Liberty's plan to restore customers' power during emergencies.	The purpose of the Liberty restoration plan is to minimize the risk inherent in a long service interruption to a variety of customer types, including medical baseline customers. Service restoration is considered a priority throughout Liberty's entire service territory. Service restoration is unique for each emergency event and restoration prioritization is influenced by multiple factors that include safety, accessibility, availability of repair parts, availability of personnel, etc. The Incident Commander, or designee, is responsible for determining the priorities of the restoration efforts. Depending on the circumstances of the emergency and in coordination with essential town/city/county and government agencies, Refer to attachment "Liberty Response_DR-007-Q03.pdf" Protocols, policies, and procedures: •Damage Assessment: The designated Incident Commander is responsible for determining how damage assessment will be best achieved for the specific emergency. The Incident Commander may delegate the responsibility, or a portion of the responsibility, to the manager(s) or other qualified individual(s)or retain this responsibility. Detailed procedures are provided in the Liberty CEMP pages 18-19, paragraph 6 subparagraphs a through g. Restoration priorities for the restoration of electric service in the Liberty Service Territory is prioritized for restoration in our mapping system. In general, restoration will proceed in this order: i. Radial transmission and substations ii. Distribution circuits with essential customers, such as health care facilities, iii. utilities, public safety, governmental facilities, and lifeline customers, iv. Circuits with the greatest number of customers v. Circuits with the most critical loads vi. Individual services that are accessible and serviceable can be addressed Below is the priority list of Liberty's essential customers. Priority assumes circuits, equip