State of California – A Natural Resources Agency
Gavin Newsom, Governor

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October 21, 2025

Eric Schwarzrock
President
Liberty Utilities (CalPeco Electric), LLC
701 National Avenue
Tahoe Vista, CA 96148

Subject: The Office of Energy Infrastructure Safety Issuance of Revision Notice on the Liberty Utilities (CalPeco Electric), LLC 2026-2028 Base Wildfire Mitigation Plan

Mr. Schwarzrock:

Enclosed is the Office of Energy Infrastructure Safety's Revision Notice on Liberty Utilities (CalPeco Electric), LLC's (Liberty) 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP). No later than November 20, 2025, Liberty must provide:

- A Revision Notice Response, which includes its response to each critical issue.
- A redlined revised version of its 2026-2028 Base WMP that includes any changes resulting from its Revision Notice Response as well as corrections to non-substantive errors identified in Section 4 of the Revision Notice.

Section 5 of the Revision Notice provides submission instructions. The schedule for Liberty's Revision Notice and Draft Decision is as follows:

Liberty Revision Notice Response Due	November 20, 2025
Opening Comments Due	December 10, 2025
Reply Comments Due	December 21, 2025
Energy Safety Draft Decision Issued No Later Than	March 2, 2026

Sincerely,

/s/ Tony Marino

Tony Marino
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

REVISION NOTICE

LIBERTY UTILITIES, LLC

2026-2028 BASE WILDFIRE MITIGATION PLAN

October 21, 2025

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1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) may direct an electrical corporation to modify its Wildfire Mitigation Plan (WMP) by issuing a Revision Notice.[1]

This Revision Notice identifies herein critical issues in Liberty Utilities, LLC's (Liberty's) 2026-2028 Base WMP (2026-2028 Base WMP). Critical issues are areas of significant concern that an electrical corporation must address prior to the completion of Energy Safety's evaluation. Liberty must address the critical issues set forth in this Revision Notice according to the parameters provided herein.

This Revision Notice also includes errors Liberty must correct in its resubmitted WMP (Section 4).

Section 5 provides submission instructions and deadlines for Liberty's Revision Notice Response.

[1] Pub. Util. Code § 8386.3(a).

2. Summary of Critical Issues

This section outlines issues associated with Liberty's 2026-2028 Base WMP that either by itself or in conjunction with other issues listed amount to critical issues. Energy Safety identified ten such issues, listed below by mitigation category.

Section 3 provides a more detailed explanation of each concern and provides the required remedies. For the purposes of Liberty's Revision Notice Response and Energy Safety's continued evaluation, each issue is assigned a tracking code.

Risk Methodology and Assessment

- **RN-LU-26-01:** Liberty's risk modeling framework and calculations overemphasized Public Safety Power Shutoff (PSPS) and outage risk.
- **RN-LU-26-02:** Liberty's description of its risk model validation reporting and internal review processes were vague and lacked the detail necessary for progress tracking.
- **RN-LU-26-03:** Liberty's risk reduction assessment lacked maturity and did not accurately assess mitigation activities' effectiveness.

Grid Design, Operations, and Maintenance

- **RN-LU-26-04:** Liberty's response to area for continued improvement LU-23B-06 "Effectiveness of Sensitive Relay Profile (SRP) and Traditional Hardening," was insufficient.

  RN-LU-26-05: Liberty's response to area for continued improvement LU-25U-04 "Cost-Benefit Analysis for the Stateline Resiliency Project," was insufficient.
- **RN-LU-26-06:** Liberty's response to area for continue improvement LU-23B-10 "Distribution Detailed Inspection Frequency," was insufficient.
- **RN-LU-26-07:** Liberty's response to area for continued improvement LU-25U-06 "Additional Inspection Practices," was insufficient.

Vegetation Management and Inspections

- **RN-LU-26-08:** Liberty's targets for Vegetation Management Inspection Program – Detailed (WMP-VM-INSP-01) were not aligned with the program's scope of work commitment.
- **RN-LU-26-09:** Liberty's pole clearing targets did not adhere to WMP Guidelines.

  RN-LU-26-10: Liberty's proposed unit of measurement for its wood and slash management target did not support its scope of work.

3. Critical Issues and Required Remedies

3.1 Risk Methodology and Assessment

3.1.1 RN-LU-26-01: Liberty's risk modeling framework and calculations overemphasized Public Safety Power Shutoff (PSPS) and outage risk.

Energy Safety evaluates the WMP for resource use efficiency ensuring "proposed activities are an efficient use of electrical corporation resources and focus on achieving the greatest risk reduction with the most efficient use of funds and workforce resources."[2] In its 2026-2028 Base WMP, Liberty's risk modeling outputs showed outage program risk to be larger than wildfire risk by multiple orders of magnitude. Liberty's identified top risk circuit, MEY3400, had a wildfire risk score of 0.000062 and an outage program risk score of 0.1111945, a difference of five orders of magnitude.[3] In comparison, PG&E's top risk circuit segment had a wildfire risk score of 92.60 and an outage program risk score of 7.10, with outage program risk being around 4.88 percent of the overall utility risk score for the top five riskiest circuit segments.[4] Additionally, Liberty's risk modeling outputs were based on miscalculations that led to an overallocation of risk on a small number of circuits. For instance, Liberty's calculations identified a single top risk circuit, MEY3400, as responsible for 87 percent of Liberty's overall utility risk.[5] Further, Liberty asserted that 93 percent of its circuit miles are identified as in the high fire threat district (HFTD),[6] making a granular understanding of highest risks circuits crucial for prioritization. Without this granularity, Liberty may not be efficiently applying resources or selecting mitigation activities that are effective at addressing the risk in the service territory.

As demonstrated by the example of Liberty's identified top risk circuit, MEY3400, Liberty's application of scaling factors and averaging risk scores have led to an overemphasis on outage program risk in its risk modeling framework calculations.

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[2] WMP Guidelines, page 11.

[3] Liberty 2026-2028 Base WMP, Table 5-6: Liberty Top-Risk Circuits, page 72.

[4] PG&E 2026-2028 Base WMP R2, Table 5-5A: Summary of Top Risk Circuit Segments, page 103.

[5] Liberty 2026-2028 Base WMP, Table 5-6: Liberty Top-Risk Circuits, page 72.

[6] Liberty 2026-2028 Base WMP, page 29.

3.1.1.1 Framework Components

Scaling Factors

Liberty used a territory-wide scale of 0 to 1 for its consequence scores in order to "[ensure] that no single metric dominates the overall evaluation" and to "[allow] for a balanced and fair comparison across all factors."[7] Additionally, Liberty's third-party wildfire risk model used a score of 0 to 1 to scale population, structure, and acreage impacts, and assigned each impact a weight of 0.5, 0.25, and 0.25, respectively.[8] Liberty's outage program risk model used similar normalization methodology, with PSPS consequence being comprised of customer minutes interrupted (CMI), cost per CMI, and expected number of fatalities, again using a scale of 0 to 1 for the consequence scores.[9] Liberty oversimplified various factors that impact risk when it applies scaling factors in this manner, which attempts to translate complex multivariable issues into limited, linear scales.

Liberty inappropriately used the same scale and methodology for wildfire and outage program risks. According to Green Power Institute's (GPI) in its stakeholder comments on Liberty's 2026-2028 Base WMP, "[p]ower outages often have lower financial and safety consequences compared to a wildfire in the same area" and that "[v]aluing the consequences of these two disparate risk events on the same 0-1 scale, combined with a higher likelihood of a PSPS/PEDS [Protective Equipment and Device Settings] outage, may be incorrectly driving a higher modeled outage risk compared to wildfire risk."[10] Energy Safety concurs with GPI's assessment, which is evident by the skewed emphasis on outage risk in Liberty's calculations.

Averaging Risk Scores

Liberty averaged its wildfire risk score and outage program risk score to determine the overall utility risk score.[11] The WMP Guidelines state that overall utility risk is "a summation for wildfire risk and outage program risk."[12]

To support its choice to use an averaged risk score, Liberty stated that, "Through collaboration with Liberty's subject matter experts, it was determined that these two risk

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[7] Liberty 2026-2028 Base WMP, Appendix B.1, page 21.

[8] Liberty 2026-2028 Base WMP, Appendix B.1, page 21.

[9] Liberty 2026-2028 Base WMP, Appendix B.1, page 30.

[10] GPI Comments, page 7.

[11] Liberty 2026-2028 Base WMP, page 49.

[12] WMP Guidelines, page 72.

components should be weighted equally at 50% each."[13] However, Liberty did not expand upon why this weighting was necessary. Although this weighting led to a de-emphasis of the current outage program risk score due to the much greater magnitude, it does not go far enough. Weighting outage risk and wildfire risk the same despite the more serious consequences of a wildfire is inappropriate.

3.1.1.2 Evaluation

Concentration of risk scores on a limited and small number of circuits, such as MEY3400 highlighted above as carrying 87 percent of liberty's overall risk, may result in a loss of understanding of actual risks throughout Liberty's territory, thus creating cascading impacts to mitigation activity selection and resource allocation.

Additionally, in its 2026-2028 Base WMP, Liberty stated that it "keeps in close contact with other utilities, vendors, and consultants familiar with wildfire mitigation through working groups, conferences, and periodic meetings."[14] Despite this statement, Liberty did not develop a risk reduction framework that is consistent with its peers and that reflects a reasonable weighting of outage and wildfire risk. Given that the decision to choose some mitigation activities over others may require a tradeoff between wildfire safety and reliability, inappropriately low weighting of wildfire risk compared to outage risk may lead to the selection of mitigation activities that do not effectively reduce its wildfire risk in HFTD or use resources. This suggests a lack of integration or understanding of more advanced modeling approaches.

3.1.1.3 Required Remedies

Liberty must revise its 2026-2028 Base WMP to include:

- A plan to adjust its wildfire and outage risk scoring methodology to account for current shortcomings in calculating and scaling outage risk for implementation by Liberty's next WMP Update. This plan must address all of the following:
    - Correction and recalibration of the third-party risk model;
    - Evaluation of current scaling and weighting of various consequence metrics for both wildfire and outage program risks, including discussion of the validity of current methods and changes made based on that evaluation;
    - Migration to summation of wildfire and outage risk scores, as opposed to averaging, based on more accurate and proper scaling of the two risk scores;

[13] Liberty 2026-2026 Base WMP, Appendix B1, page 10.

[14] Liberty 2026-2028 Base WMP, page 125.

  - Coordination with other electrical corporations to determine methodology for scaling and weighting of risk metrics; AND
  - Implementation timeline and milestones of a new methodology version.
- For the interim, a recalculation of all risk score calculations and rankings using only wildfire risk throughout its 2026-2028 Base WMP and make mitigation activity adjustments accordingly.

3.1.2 RN-LU-26-02: Liberty's description of its risk model validation reporting and internal review processes were vague and lacked the detail necessary for progress tracking.

In addition to the lack of clarity on implementation as noted in RN-LU-26-01, Liberty's risk model validation reporting did not adhere to the WMP Guidelines requirements for a risk assessment improvement plan.[15] The WMP Guidelines require an electrical corporation to provide timelines and key milestones regarding its plan to improve upon self-identified modeling issues.[16] Liberty identified its risk modeling validation tracking and reporting as needing improvement.[17] However, Liberty's risk assessment improvement plan did not provide enough information in order for Energy Safety to evaluate that Liberty is adequately validating its risk models.

Liberty's risk assessment improvement plan did not provide timelines or key milestones supporting the development of its risk model validation tracking and reporting, which are important and necessary for continued iteration and improvement of risk models.[18] Without proper risk model validation reporting, it is difficult to determine if Liberty's risk model results provided accurate representations of risk. For instance, Liberty stated that because it "does not have an adequate system to display results" from its third-party risk assessment tool,[19] it may be unable to verify results internally. Additionally, Liberty did not adequately discuss how it reviewed and vetted inputs, reviewed model outputs, and did not provide details regarding continual improvement.[20] And without a plan it is difficult to determine if Liberty is fully aware of its deficiencies through its risk models.

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[15] WMP Guidelines, pages 57-59.

[16] WMP Guidelines, pages 57-59.

[17] Liberty 2026-2028 Base WMP, pages 82-83.

[18] Liberty 2026-2028 Base WMP, pages 81-83.

[19] Liberty 2026-2028 Base WMP, pages 81-82.

[20] Liberty 2026-2028 Base WMP, Table 5-7: Liberty Utility Risk Assessment Improvement Plan, page 83.

It is also unclear to what extent Liberty's risk model has been validated. Liberty stated that once its initial wildfire risk model implementation is complete, it expects to develop procedures for risk model validation activities and independent reviews, as well as its own internal review.[21] However, Liberty's description of this internal review was vague only stating that "Liberty continues to maintain an internal Risk Focus Group to review wildfire risk data and model outputs."[22] Further, Liberty stated it relied on its existing third-party vendors to validate the vendor's own models.[23] As such, Liberty did not demonstrate that it performed any formal internal or independent review of its risk models or provide a plan for when this will be performed.

3.1.2.1 Required Remedies

Liberty must revise its 2026-2028 Base WMP to include:

- Documentation from Liberty's internal Risk Focus Group, including:
  - Dates the group met;
  - Topics covered during those meetings;
  - Results of those meetings, including any changes made to risk model methodology; AND
  - Any documentation related to risk models, including findings and reports, that the Risk Focus Group generated.
- A risk assessment improvement plan, with milestones and timelines, to evaluate and validate its current risk model methodologies and outputs for Liberty to implement by the next WMP Update. This plan must include:
  - Evaluation of the risk modeling methodologies implemented by Liberty's third-party vendors;
  - Evaluation of the accuracy of risk model outputs; AND
  - Implementation of an ongoing risk assessment improvement plan to continue to evaluate and validate risk models.

[21] Liberty 2026-2028 Base WMP, page 76.

[22] Liberty 2026-2028 Base WMP, page 76.

[23] Liberty 2026-2028 Base WMP, page 79.

3.1.3 RN-LU-26-03: Liberty's risk reduction assessment lacked maturity and did not accurately assess mitigation activities' effectiveness.

Section 6.2.1.2 "Risk Impact of Activities" of Energy Safety's WMP Guidelines requires electrical corporations to calculate the expected percentage risk reduction for each of their activity targets over the WMP cycle.[24] The WMP Guidelines also require that the expected percentage risk reduction is the expected percentage reduction for the last day of Base WMP implementation compared to the first day of implementation.[25] Liberty's risk reduction assessment did not follow these requirements and lacks maturity. Because Liberty's risk reduction assessment did not include the correct expected percentage risk reduction calculation, it did not accurately assess mitigation activities' effectiveness. Liberty's risk reduction assessment therefore lacks overall maturity.

In Table 6-4 "Risk Impact Activities" of Liberty's 2026-2028 Base WMP, many of the risk reduction percentages have negative values.[26] Given that Liberty should be implementing mitigation activities each year, a year-to-year decrease of risk is expected.[27] However, Liberty demonstrated that its projected overall service territory risk did not have a downward trend and instead oscillated between increasing and decreasing depending on the year.

In response to a data request, Liberty stated that "negative values presented in the risk reduction results are outputs from the risk model and reflect statistically non-significant changes in risk."[28] Liberty explained that its model simulates each risk scenario 100 times[29] and that increasing the number of simulation iterations could decrease the variation between minimum and maximum values but would not change the average values.[30] Additionally, Liberty's statistically non-significant risk reduction values further indicate that Liberty's risk model lacks maturity. While Liberty noted that it is "a smaller utility with limited resources,"[31] other electrical corporations with small service territories in California, such as Bear Valley

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[24] WMP Guidelines, page 73.

[25] WMP Guidelines, page 73.

[26] Liberty 2026-2028 Base WMP, page 102.

[27] Liberty 2026-2028 Base WMP, Figure 6-2: Projected Overall Service Territory Risk, page 99.

[28] Response to DR-002, Question 7.

[29] Response to DR-002, Question 7.

[30] Response to DR-006, Question 1.

[31] Response to DR-002, Question 9.

Electric Service, Inc. (BVES), have demonstrated an ability to quantify and report positive risk reduction values.[32]

Liberty's current risk model outputs led to a misrepresentation of mitigation effectiveness and associated risk reduction throughout Liberty's 2026-2028 Base WMP. A more accurate understanding of the effectiveness of mitigations activities is required to select mitigation activities for maximum wildfire risk reduction and resource usage. Additionally, an accurate understanding of the associated risk reduction is necessary to support Liberty's planned mitigation activities in order to effectively reduce wildfire risk over time and maximize the amount of risk reduced.

3.1.3.1 Required Remedies

In its revised 2026-2028 Base WMP, Liberty must:

- Recalculate risk reduction values using only wildfire risk and excluding outage risk.[33]
    - Identify risk reduction values that are still statistically non-significant and do not report negative risk reduction values unless the mitigation activity increases utility risk.
- Provide its evaluation of the number of risk model scenarios and validation necessary for more accurate representations of mitigation activity effectiveness values. This evaluation must include determining the number needed, calculated using only wildfire risk and excluding outage risk, in which the outputs begin converging towards a significant average, and the cost-benefit for running additional scenarios.
- Provide new versions of the following figure and tables with the updated values for risk reduction or mitigation effectiveness based on running additional scenarios:
    - Figure 6-2: Projected Overall Service Territory Risk;
    - Table 6-4: Risk Impact Activities;
    - Table 8-1: Liberty Grid Design, Operation and Maintenance Targets by Year, 2026-2028;
    - Table 9-1: Liberty Vegetation Management Targets by Year (Non-inspection Targets);
    - Table 9-2: Liberty Vegetation Management Inspections and Pole Clearing Targets by Year; AND
    - Table 10-1: Situational Awareness WMP Initiative Targets.

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[32] BVES 2026-2028 Base WMP, Table 6-3: Risk impact of Initiative Activities, pages 89-95.

[33] To algin with the Required Remedy for LU-RN-26-01.

3.2 Grid Design, Operations, and Maintenance

3.2.1 RN-LU-26-04: Liberty's response to area for continued improvement LU-23B-06 "Effectiveness of Sensitive Relay Profile (SRP) and Traditional Hardening," was insufficient.

The WMP Guidelines state that, "[a]reas for continued improvement must be addressed in the timeline directed by Energy Safety in the decision. Failure to show maturation in these areas may result in a Revision Notice or denial."[34]

In its 2026-2028 Base WMP submission, Liberty did not sufficiently respond to area for continued improvement LU-23B-06 "Effectiveness of Sensitive Relay Profile (SRP) and Traditional Hardening."[35] Energy Safety has repeatedly required Liberty to provide more information regarding its activity selection analysis for SRP verses traditional overhead hardening mitigation.

3.2.1.1 LU-23B-06 History

2023-2025 Base WMP and Evaluation

In September 2023, Energy Safety issued a Revision Notice on Liberty's 2023-2025 Base WMP after Liberty reported a decreased rate of covered conductor in the submission.[36] For RN-LU-23-02 in the Revision Notice, "Decreased covered conductor targets," Liberty was required to revise its WMP to include analysis of its SRP and traditional hardening mitigation activities, and adjust its hardening targets.[37]

In response to RN-LU-23-02 in the Revision Notice, Liberty increased its covered conductor installation and stated that it would focus on traditional hardening and SRP.[38] However, Liberty's response did not include the required analysis or calculations to support the target changes, and its new covered conductor target remained below Liberty's historic target rate.

To address this, Energy Safety issued an area for continued improvement in its decision on Liberty's 2023-2025 Base WMP, numbered LU-23-06, that required Liberty to demonstrate the

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[34] WMP Guidelines, pages 10; WMP Guidelines, page 11.

[35] Decision on Liberty 2025 WMP Update, page 59.

[36] Revision Notice on Liberty's 2023-2025 Base WMP, page 5.

[37] Revision Notice on Liberty's 2023-2025 Base WMP, page 5.

[38] Decision on Liberty's 2023-2025 Base WMP, page. 37.

effectiveness of its SRP, traditional overhead hardening, and covered conductor mitigation selection in its 2025 WMP Update.[39]

2025 WMP Update and Evaluation

In response to LU-23-06, Liberty's 2025 WMP Update contained a table identifying the effectiveness of SRP, traditional overhead hardening, and covered conductor with each reported as "high." Liberty's response still lacked the required supporting analysis and calculations.[40] In its Decision on Liberty's 2025 WMP Update, Energy Safety extended area for continued improvement LU-23-06, unmodified but renumbered as LU-23B-06.[41]

In LU-23B-06, Energy Safety continued the requirement for Liberty to provide calculations for ignition reduction effectiveness for covered conductor compared to SRP, traditional overhead hardening, and SRP in combination with traditional hardening.[42] This calculation is vital to support Liberty's plan to focus on its SRP program and its claim that SRP can reduce risk over a greater area for less cost than other methods.

3.2.1.2 2026-2028 Base WMP and Evaluation

In response to LU-23B-06, Liberty's 2026-2028 Base WMP provided a comparison summary of the risk calculations for different mitigation measures but did not provide its risk reduction effectiveness calculations or analysis.[43] Liberty merely provided in a conclusory statement that "normal replacement" deployed with SRP had a higher cost-benefit ratio than covered conductor or undergrounding.[44]

Liberty's comparison summary did not satisfy LU-23B-06. It failed to demonstrate consideration of various ignition risk drivers, deployment time and resources, or riskiest areas in Liberty's activity selection analysis for SRP versus traditional overhead hardening mitigation. Liberty did not demonstrate performance comparison in forested versus non-forested areas within the analysis either. Without a complete supporting analysis, Liberty's mitigation activity selection does not meet the WMP Guideline requirements and is unsubstantiated.

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[39] Decision on Liberty's 2023-2025 Base WMP, page. 37.

[40] Liberty 2025 WMP Update (R1), pages 34-35.

[41] Decision on Liberty's 2025 WMP Update, page 59.

[42] Decision on Liberty's 2025 WMP Update, page 59.

[43] Liberty 2026-2028 Base WMP, page 527.

[44] Liberty 2026-2028 Base WMP, page 527.

3.2.1.3 Required Remedies

In its revised 2026-2028 Base WMP, Liberty must:

- Provide the ignition reduction effectiveness for the projects and activities it outlines in Table 1-2. Liberty must provide, including but not limited to, ignition reduction effectiveness for covered conductor without SRP, undergrounding without SRP, undergrounding, covered conductor, normal replacement baseline, and normal replacement without SRP.
- Demonstrate how it considered various ignition risk drivers, deployment time, and resources, and provide performance comparison in forested versus non-forested areas, and risk model output of riskiest areas, as per the requirements of area for continued improvement LU-23B-06.
- Discuss how it uses its analysis to determine and set covered conductor targets. This includes explaining the methodology used to prioritize covered conductor deployment at the circuit-segment level.

3.2.2 RN-LU-26-05: Liberty's response to area for continued improvement LU-25U-04 "Cost-Benefit Analysis for the Stateline Resiliency Project," was insufficient.

The WMP Guidelines state that, "[a]reas for continued improvement must be addressed in the timeline directed by Energy Safety in the decision. Failure to show maturation in these areas may result in a Revision Notice or denial."[45]

In its 2026-2028 Base WMP submission, Liberty did not sufficiently respond to area for continued improvement LU-25U-04 "Cost-Benefit Analysis for the Stateline Resiliency Project."[46]

3.2.2.1 LU-25U-04 History

2023-2025 Base WMP and Evaluation

In its 2023-2025 Base WMP, Liberty introduced the Stateline Resiliency Project as an undergrounding project adjacent to its Stateline Substation.[47] Liberty stated this project would underground 1.2 miles of distribution on the 2300 and 2200 circuits and, "[b]ecause of the limited number of service connections and the local terrain, the cost for this

[45] WMP Guidelines, page 11.

[46] Liberty 2026-2028 Base WMP, pages 528-529.

[47] Liberty 2023-2025 Base WMP (R2), page 160.

undergrounding project is reasonable."[48] Given the infancy of the project, Energy Safety did not have any comments at the time, and instead tracked the project for future updates.

2025 WMP Update and Evaluation

As part of its 2025 WMP Update submission, Liberty included an update on the Stateline Resiliency Project that stated, "Liberty is no longer targeting the Stateline Resiliency Project undergrounding during the current WMP cycle."[49] Liberty explained that it updated its 2023-2025 Base WMP undergrounding targets to postpone the Stateline Resiliency Project as part of a strategic decision to focus on a separate undergrounding effort called the Tahoe Vista Project which had been delayed .[50] This change reduced the number of circuit miles targeted from 1.3 to 0.4 yet increased the projected undergrounding expenditures from $7 million to $9.1 million.[51]

In the Decision on Liberty's 2025 WMP Update, Energy Safety stated, "Both the Tahoe Vista and Stateline Resiliency projects are entirely in the HFTD Tier 2, but the composite risk score of the Stateline Resiliency Project circuits is 30% higher than the Tahoe Vista Project."[52] Because of this abrupt shift to a project with less risk reduction, Energy Safety concluded that Liberty lacked maturity on its undergrounding decision-making process and issued area for continued improvement LU-25U-04 "Cost-Benefit Analysis for the Stateline Resiliency Project."[53]

LU-25U-04 required Liberty to discuss its cost-benefit analysis evaluation and decision-making process for all undergrounding projects, to include the Stateline Resiliency Project, as well as consideration of feasibility and resource use efficiency, and its plans to improve its process based on lessons learned from the Tahoe Vista Project.[54]

LU-25U-04 further required Liberty to provide cost-benefit analysis and ratios for hardening the Stateline Resiliency Project through different scenarios: undergrounding, covered conductor, SRP, and traditional overhead hardening.[55] For each hardening scenario, LU-25U-

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[48] Liberty 2023-2025 Base WMP (R2), page 163.

[49] Liberty 2023-2025 Base WMP (R6), page 161.

[50] Liberty 2023-2025 Base WMP (R6), page 161.

[51] Decision on Liberty's 2025 WMP Update, pages 25.

[52] Decision on Liberty's 2025 WMP Update, pages 26.

[53] Decision on Liberty's 2025 WMP Update, pages 59-60.

[54] Decision on Liberty's 2025 WMP Update, pages 59-60.

[55] Decision on Liberty's 2025 WMP Update, pages 59-60.

04 required Liberty to provide the estimated circuit risk scores after hardening.[56] Without these risk scores, it is unclear whether Liberty's decision-making process regarding its proposed undergrounding program is substantiated.

3.2.2.2 2026-2028 Base WMP and Evaluation

In Liberty's response to LU-25U-04 in its 2026-2028 Base WMP, Liberty provided a table with cost benefit calculations comparing the Stateline Resiliency Project and Tahoe Vista Project with and without SRP, but presented no other comparisons, discussion, or analysis that is required by LU-25U-04.[57]

Overall, Liberty did not provide the requested analysis (e.g. undergrounding, covered conductor, and traditional overhead scenarios and associated estimated circuit risk scores) of the Stateline Resiliency Project or documentation to explain its cost-benefit analysis for any of its undergrounding projects to satisfy area for continued improvement LU-25U-04.[58] By not providing the required analysis, Energy Safety's concerns regarding Liberty's decision-making process remain.

3.2.2.3 Required Remedies

In its revised 2026-2028 Base WMP, Liberty must:

- Provide an explanation of its current cost-benefit analysis and decision-making process for its undergrounding programs including the following:
  - Lessons learned from the Tahoe Vista Project; AND
  - The cost-benefit analysis and cost-benefit ratios broken down by activity (i.e., undergrounding, covered conductor, SRP, covered conductor in combination with SRP, and traditional hardening in combination with SRP) for the 1.2 circuit-miles of overhead distribution on the 2300 and 2200 circuits known as the Stateline Resiliency Project.
- Provide the required documentation to support its methodology, calculations, and estimates used to determine the cost values as required by LU-25U-04.

[56] Decision on Liberty's 2025 WMP Update, pages 59-60.

[57] Liberty 2026-2028 Base WMP, pages 528-529.

[58] Liberty 2026-2028 Base WMP, pages 528-529.

3.2.3 RN-LU-26-06: Liberty's response to area for continue improvement LU-23B-10 "Distribution Detailed Inspection Frequency," was insufficient.

The WMP Guidelines state that, "[a]reas for continued improvement must be addressed in the timeline directed by Energy Safety in the decision. Failure to show maturation in these areas may result in a Revision Notice or denial."[59]

In its 2026-2028 Base WMP submission, Liberty did not sufficiently respond to the area for continued improvement LU-23B-10 "Distribution Detailed Inspection Frequency."[60]

3.2.3.1 LU-23B-10 History

2023-2025 Base WMP and Evaluation

In its Decision on Liberty's 2023-2025 Base WMP, Energy Safety noted that Liberty performed the minimum frequency of detailed inspections required by General Orders (GOs) 95 and 165.[61] Energy Safety stated that, "[t]his may not adequately cover wildfire risk, particularly in the riskiest areas, given high-priority issues could propagate within the five-year timeline."[62] To address this, Energy Safety issued area for continued improvement LU-23-10 "Distribution detailed inspection frequency."[63]

LU-23-10 required Liberty in its 2025 WMP Update to outline a plan to update its inspections in higher risk areas, and an analysis on its existing inspection program.[64] Additionally, Energy Safety required that, if Liberty elected to not adjust its inspection frequencies, Liberty must instead demonstrate that its existing program adequately addresses risk through an analysis of Level 1 and critical issues found during distribution detailed inspections.[65]

2025 WMP Update and Evaluation

In its 2025 WMP Update, in response to LU-23-10, Liberty stated that its existing detailed inspection program adequately addresses risk and increasing the inspection frequency would

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[59] WMP Guidelines, page 11.

[60] Decision on Liberty's 2023-2025 Base WMP, page 77-78.

[61] Decision on Liberty's 2023-2025 Base WMP, page 77-78.

[62] Decision on Liberty's 2023-2025 Base WMP, page 44.

[63] Decision on Liberty's 2023-2025 Base WMP, page 77-78.

[64] Decision on Liberty's 2023-2025 Base WMP, page 77-78.

[65] Decision on Liberty's 2023-2025 Base WMP, page 77-78.

not significantly reduce risk.[66] Liberty further stated that 0.04 percent of detailed inspections in the HFTD Tier 3 resulted in a Level 1 condition, 8.82 percent resulted in a Level 2 condition, and 91.14 percent of inspections resulted in low or no risk findings.[67]

Energy Safety found this response insufficient because Liberty did not provide any of the required information. In its Decision on Liberty's 2025 WMP Update, Energy Safety modified the area for continued improvement to provide more guidance in addition to the initial required reporting. The area for continued improvement was renumbered to LU-23B-10 (to denote that it was carried over from the 2023-2025 Base WMP Decision).[68]

Specifically, LU-23B-10 required Liberty to outline a plan to update its detailed inspections in higher risk areas that included the following: an analysis for determining the updated frequency; prioritization of higher risk areas based on risk analysis and risk model output; and updates to inspection checklists to account for configurations posing higher wildfire risk.[69] If Liberty elected not to adopt a risk-based approach, LU-23B-10 required Liberty to demonstrate that its existing program adequately addresses risk through an analysis of Level 1 and 2 conditions found during detailed inspections of its highest risk circuits.[70]

3.2.3.2 2026-2028 Base WMP and Evaluation

In its 2026-2028 Base WMP, in response to LU-23B-10, Liberty elected not to adopt a risk-based approach to detailed inspections. Instead, Liberty stated that it treats its entire system as high fire risk and its approach is to implement additional patrol inspections during high-risk events and perform discretionary inspections based on environmental exposure.[71] Furthermore, Liberty did not provide the analysis of Level 1 and 2 conditions found on its highest risk circuits, which LU-23B-10 required if Liberty elected not to update its detailed inspection frequencies.

Liberty's stated approach to implementing additional patrol inspections during high-risk events and performing discretionary inspections based on environmental exposure[72] is inadequate. In its 2026-2028 Base WMP, Liberty did not set quantitative or qualitative targets

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[66] Liberty 2025 WMP Update (R1), page 42-43.

[67] Liberty 2025 WMP Update (R1), page 43.

[68] Decision on Liberty's 2023-2025 Base WMP, page 31-32.

[69] Liberty 2026-2028 Base WMP, pages 530-531.

[70] Liberty 2026-2028 Base WMP, pages 530-531.

[71] Liberty 2026-2028 Base WMP, Appendix D Section 1.7.

[72] Liberty 2026-2028 Base WMP, Appendix D, pdf page 531.

for additional patrol inspections during high-risk events.[73] Also, Liberty's find rate of Level 2 conditions during patrol inspections was only 0.12 percent, compared to its 7.75 percent find rate for detailed inspections.[74] Further, when it comes to performing discretionary inspections based on environmental exposure, Liberty did not set targets for these inspections other than for outage restoration drone inspections.[75] Outage restoration drone inspections do not reduce wildfire risk.

PG&E, Southern California Edison (SCE), San Diego Gas and Electric (SDG&E), and BVES all perform routine aerial drone inspections on their distribution assets and PacifiCorp has committed to piloting a proactive drone inspection program.[76] Additionally, PG&E, SCE, and BVES perform infrared inspections on their distribution assets, and PacifiCorp has committed to piloting infrared distribution inspections.[77] Although Liberty stated that its inspection program is compliant with California Public Utilities Commission (CPUC) GO 165, the routine programs of Liberty's peer electrical corporations demonstrate that the industry best practice in California is to inspect high risk structures more frequently or with a wider variety of inspection types than required by GO 165. Liberty's proposed inspection cadence is not in line with industry best practices in California and will likely result in unidentified and uncorrected wildfire risk for longer periods of time. Taking Liberty's statement that it treats its entire system as high fire risk literally,[78] it is unclear why its inspection practices are less thorough than the other California electrical corporations.

In addition to not following industry best practice, Liberty's statement that it treats its entire system as high fire risk when scheduling detailed inspections was unsupported by the wildfire risk scores provided to Energy Safety in response to a data request.[79] Liberty provided the wildfire risk and circuit length for each circuit in its service territory.[80] Energy Safety found that over 50 percent of the wildfire risk on Liberty's system is attributable to the top five riskiest circuits, and that these five circuits account for only 25 circuit miles of Liberty's system.[81] Energy Safety also found that 90 percent of Liberty's wildfire risk is attributable to 330 miles, approximately 16 percent of its system.[82] This demonstrates that the risk on

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[73] Liberty 2026-2028 Base WMP, page 530-531.

[74] Liberty 2026-2028 Base WMP, page 134.

[75] Liberty 2026-2028 Base WMP, page 113 -115.

[78] Liberty 2026-2028 Base WMP, Appendix D, pdf page 531.

[79] Response to DR-005, Question 1.

[80] Response to DR-005, Question 1.

[81] Response to DR-005, Question 1.

[82] Response to DR-005, Question 1.

Liberty's system is not evenly spread across its service territory, and that Liberty has the ability to identify riskier circuits and increase the frequency of detailed inspections at those locations.

3.2.3.3 Required Remedies

In its revised 2026-2028 Base WMP, Liberty must:

- Provide a plan, including an implementation timeline, to increase its detailed distribution inspection frequency on its entire system during the 2026-2028 WMP cycle. If Liberty can identify areas or circuits of relatively higher wildfire risk on its system, it may instead provide a plan, including an implementation timeline, to increase its detailed distribution inspection frequency on the identified areas or circuits.
- Provide a plan, including a timeline, to pilot or implement additional inspection programs that proactively identify Level 1 and 2 conditions, as defined by GO 95, during the 2026-2028 WMP cycle.
- Provide an analysis of Level 1 and 2 conditions found on its highest wildfire risk circuits as required by LU-23B-10. This analysis must include the number of findings and the date of the most recent detailed inspection of the following circuits:
  - LOY619
  - T621
  - RUS7900
  - CAL2501
  - T609
  - T111
  - T629
  - GLS7600
  - TRK7202
  - TAH7200
  - T640
  - CEM41
  - T608
  - POR3100
  - SQV8300
  - HOB7700
  - T619
  - CEM42
  - T132
  - POR3200
  - STL2200
  - WSH201
  - STL3101

3.2.4 RN-LU-26-07: Liberty's response to area for continued improvement LU-25U-06 "Additional Inspection Practices," was insufficient.

The WMP Guidelines state that, "[a]reas for continued improvement must be addressed in the timeline directed by Energy Safety in the decision. Failure to show maturation in these areas may result in a Revision Notice or denial."[83]

[83] WMP Guidelines, page 11.

In its 2026-2028 Base WMP submission, Liberty did not sufficiently respond to area for continued improvement LU-25U-06 “Additional Inspection Practices.”

3.2.4.1 LU-25U-06 History

2023-2025 Base WMP and Evaluation

In its 2023-2025 Base WMP, Liberty stated that in 2023 it planned to incorporate three new technologies: LiDAR[84], infrared, and drone inspections.”[85] The details for the pilots were vague in regards to timeline, milestones, evaluation criteria, and scope. Given the limited information provided regarding the new technologies, Energy Safety’s Decision on Liberty’s 2023-2025 Base WMP included area for continued improvement LU-23-12. LU-23-12 required Liberty to discuss its drone, infrared, and LiDAR pilots and provide milestone timeline and project scopes for each pilot in the 2025 WMP Update.[86]

2025 WMP Update and Evaluation

In Liberty’s 2025 WMP Update, it partially responded to LU-23-12 by discussing the 0.1-mile scope; however, Liberty did not provide a timeline or milestones for the pilot.[87] The lack of a timeline or milestones made it difficult to assess the pilot’s progress. Additionally, a scope of 0.1 mile was too small to draw meaningful conclusions about the effectiveness of infrared inspections in Liberty’s service territory. Due to these continued concerns, in its Decision on Liberty’s 2025 WMP Update, Energy Safety modified the area for continued improvement and renamed it: LU-25U-06.[88] Again, LU-25U-06 required Liberty to discuss its drone, infrared, and LiDAR pilots and provide timelines, project scopes, and added a discussion for success criteria for each pilot.[89]

3.2.4.2 2026-2028 Base WMP and Evaluation

In its 2026-2028 Base WMP, Liberty provided the pilot timelines and scopes but did not include success criteria for any of its pilots. Additionally, Liberty elected not to implement infrared or LiDAR inspections as permanent programs during the 2026-2028 WMP cycle.[90]

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[84] Light Detection and Ranging.

[85] Liberty 2023-2025 Base WMP (R2), page 179.

[86] Decision on Liberty’s 2023-2025 Base WMP, page 78.

[87] Liberty’s 2025 WMP Update (R1), page 42.

[88] Decision on Liberty’s 2025 WMP Update, page 61.

[89] Energy Safety Decision for Liberty 2025 WMP Update, page 61.

Further, Liberty did not discuss how it determined the success of the pilot or provide the criteria it used to determine that it would not make the infrared pilot a continuous program.[91]

Given that multiple electrical corporations' infrared inspections have demonstrated low find rates, and given that infrared inspections are typically more effective when other factors are considered (e.g., loading and ambient temperature),[92] Energy Safety finds it unlikely that Liberty's infrared pilot of performing inspections on 0.1 mile of assets would yield findings. Liberty's infrared pilot is even less likely to have findings if it is not inspecting its assets during annual peak load conditions and if the assets rarely or never experience high loading.

Liberty provided insufficient details to support such a limited scope of 0.1-mile for its infrared pilot and did not include success criteria. Therefore, Energy Safety is unable to assess Liberty's decision to not implement infrared inspections as a permanent program as being well informed. Energy Safety finds Liberty's response to this area for continued improvement to be insufficient.

3.2.4.3 Required Remedies

In its revised 2026-2028 Base WMP, Liberty must:

- Update its response to area for continued improvement LU-25U-06 to discuss:
  - How it selected the assets to be inspected during its infrared pilot;
  - The success criteria used in the infrared pilot;
  - Why it did not elect to expand the infrared pilot; AND
  - Why it did not elect to implement infrared inspections as a continuous program.

3.3 Vegetation Management and Inspections

3.3.1 RN-LU-26-08: Liberty's targets for Vegetation Management Inspection Program – Detailed (WMP-VM-INSP-01) were not aligned with the program's scope of work commitment.

Energy Safety's WMP Guidelines state that targets are commitments for specific activities that track the completion of and must align with programs and activities in an electrical

[91] Liberty 2026-2028 Base WMP, Appendix D Section 1.8.

[92] PG&E 2026-2028 Base WMP R2, Table 8.3-1; SCE 2026-2028 Base WMP, Table 8-2; SDG&E 2026-2028 Base WMP R1, page 192.

corporation's WMP.[93] Liberty's targets for its Vegetation Management Inspection Program – Detailed (WMP-VM-INSP-01) did not align with that program's scope of work.

In Table 9-2 "Liberty Vegetation Management Inspections and Pole Clearing Targets by Year" of its 2026-2028 Base WMP, Liberty listed its three-year total for its detailed inspections target as 660 circuit miles of its service territory in the HFTD.[94] Additionally, liberty stated in a data request, "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."[95] However, Liberty's description of the scope of work in its 2026-2028 Base WMP stated it will perform the detailed inspections, "territory-wide on a three-year cycle,"[96] making it unclear as to Liberty's commitment to the mitigation activity and alignment with the associated target.

3.3.1.1 Required Remedies

In its revised 2026-2028 Base WMP, Liberty must:

- Revise its Vegetation Management Inspection Program – Detailed (WMP-VM-INSP-01) targets in Table 9-2 to be for its whole territory every three years, consistent with the scope of its inspection activities.

3.3.2 RN-LU-26-09: Liberty's pole clearing targets did not adhere to WMP Guidelines.

Energy Safety's WMP Guidelines require that electrical corporations provide a quantitative target for pole clearing performed in compliance with Public Resources Code (PRC) section 4292.[97] The WMP Guidelines further require electrical corporations to provide an overview of pole clearing, including that performed in compliance with PRC section 4292 and that performed outside of PRC section 4292 requirements (i.e., pole clearing performed outside of the State Responsibility Area).[98] Liberty's 2026-2028 Base WMP pole clearing targets did not follow the WMP Guidelines requirements because it did not separate out PRC section 4292 and non-PRC section 4292 pole clearing work.

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[93] WMP Guidelines, page 12.

[94] Liberty 2026-2028 Base WMP, page 170.

[95] Response to DR-001, question 1.

[96] Liberty 2026-2028 Base WMP, page 172.

[97] WMP Guidelines, page 104.

[98] WMP Guidelines, page 110.

In Section 9.4 "Pole Clearing" of its 2026-2028 Base WMP, Liberty stated that it owns approximately 23,000 wood poles that support distribution and transmission facilities.[99] Liberty further stated that it conducts annual pole clearing in State and Federal Responsibility Areas and that there are approximately 4,900 poles that require clearing in these areas on an annual basis.[100] Liberty did not explain how it determined 4,900 as the number of poles that require clearing, nor did it specify whether this work is related to PRC section 4292 compliance.

In response to a data request, Liberty confirmed that its pole clearing target of 4,900 poles, includes poles required to be cleared under PRC section 4292 and poles not required by PRC section 4292.[101] By not separating out pole clearing targets it is unclear how Liberty chooses and prioritizes discretionary pole clearing. Liberty not only did not meet the guidelines requirement but it also demonstrated a lack of risk-based mitigation selection, resource management, and forward-looking growth in its understanding of the risk that exists in its service territory.

3.3.2.1 Required Remedies

In its revised 2026-2028 Base WMP, Liberty must:

- Create two separate pole clearing targets each year for 2026, 2027, and 2028. For each year, the WMP must include one target for (1) work performed in compliance with PRC section 4292, and (2) another target for work outside of PRC section 4292, in accordance with the WMP Guidelines.
- Include a narrative in Section 9.4.1 of its pole clearing activities that are (1) performed in compliance with PRC section 4292 and (2) performed outside the requirements of PRC section 4292.

3.3.3 RN-LU-26-10: Liberty's proposed unit of measurement for its wood and slash management target did not support its scope of work.

Energy Safety's WMP Guidelines state that targets are commitments for specific activities that track the completion of and must align with programs and activities in an electrical corporation's WMP.[102] Liberty's stated unit of measurement for its Wood and Slash Management target (WMP-VM-VFM-02) was in acres treated, based on the parcel size of the

[99] Liberty 2026-2028 Base WMP, page 182.

[100] Liberty 2026-2028 Base WMP, page 182.

[101] Response to DR-001, Question 3.

[102] WMP Guidelines, page 12.

property being worked not the volume of debris removed. This measurement did not align Liberty's supporting narrative that detailed the scope of work.[103]

In a data request response, Liberty stated that it, "[c]alculates acres treated based off completed work orders with cleanup methods of 100 percent removal."[104] Liberty's stated unit of measure did not accurately capture the results of its treatment methods and may result in a misalignment between its targets and its scope of work. Given that the amount and type of wood and slash management work orders completed within a span or parcel can vary, and that Liberty does not treat these areas using the same treatment method, Liberty's unit of measure for its wood and slash management target (WMP-VM-VFM-02) does not serve as an accurate and consistent measurement for the activities described in its 2026-2028 Base WMP.

Liberty must provide a measurement unit that can more appropriately capture the work conducted for its fuel reduction program for Energy Safety to assess the program's risk reduction benefit. By using a measurement unit of "acres treated" based on parcel size, Liberty may over and under-estimate an individual work order's reduction of fuels, depending on the amount and type of wood and slash management work orders. Liberty's inability to consistently capture the type and amount of work conducted demonstrates a lack of program maturity and understanding of risk-reduction benefits in its wood and slash management program.

3.3.3.1 Required Remedies

In its revised 2026-2028 Base WMP, Liberty must:

- Revise its wood and slash management target in Table 9-1 so that the unit of measurement aligns with the activities described in Section 9.5 of its 2026–2028 Base WMP (e.g., the mass or volume of woody material removed from project locations).

OR

- Include a narrative in Section 9.5 explaining how the number of acres treated as part of Liberty's wood and slash management initiative target (WMP-VM-VFM-02) will be calculated throughout the 2026-2028 WMP cycle.

[103] Liberty 2026-2028 Base WMP, page 170.

[104] Response to DR-001, Question 4.

4. Errata

Energy Safety identified errors for Liberty to correct in its revised 2026-2028 Base WMP. Liberty must revise its 2026-2028 Base WMP to correct the errors identified *Table 1, Errors in the Liberty 2026-2028 Base WMP.*

Table 1. Errors in the Liberty 2026-2028 Base WMP

Section	WMP Page Number	Correction or Clarification
Overall	-	The tables in Liberty's WMP were not numbered consistently with the numbering in the WMP Guidelines. **Liberty must revise its 2026-2028 Base WMP with separate numbering to distinguish its own tables from the WMP Guidelines-required tables so that the table numbers from the WMP Guidelines are maintained.**
9.1.2 Quantitative Targets	170	In Table 9-1 "Liberty Vegetation Management Targets by Year (Non-inspection Targets)," Liberty did not include a tracking ID for its Workforce Planning initiative in the "Activity (Tracking ID)" column. **Liberty must provide a tracking ID for its Workforce Planning initiative in Table 9-1.**
9.11 Quality Assurance and Quality Control	200	In Table 9-20 and Table 9-21, Liberty did not include its Compliance Audit information, which it described in Section 9.11. **Liberty must provide the following:** • **A Compliance Audit initiative/activity to its Vegetation Management QA and QC Program Objectives table, as provided in response to an Energy Safety Data Request OEIS-P-WMP_2025-Liberty-002, Question 1.**[105]

[105] Response to DR-002, question 1.

Section	WMP Page Number	Correction or Clarification
		• **A Compliance Audit initiative/activity to its Vegetation Management QA and QC Activity Targets table (Table 9-21) along with the Pass Rate Targets for 2026, 2027, and 2028, as provided in response to an Energy Safety data request OEIS-P-WMP_2025-Liberty-002, Question 1.**[106] • **A description of how it calculates its Compliance Audit pass rate to Section 9.11.4 "Pass Rate Calculation," as provided in response to an Energy Safety data request OEIS-P-WMP_2025-Liberty-002, Question 2.**[107]
9.11 Quality Assurance and Quality Control	201	In Table 9-21 "Vegetation Management QA and QC Activity Targets," Liberty did not provide a confidence level or margin of error for its audit of Detailed Inspections. **Liberty must provide the confidence level and margin of error for its Detailed Inspections that results from its sample of 73 out of 220 circuit miles in Table 9-21.**
9.11.4 Pass Rate Calculations	203	In response to Data Request OEIS-P-WMP_2025-LU-002 Question 4[108] and Data Request OEIS-P-WMP_2025-LU-004 Question 2[109], Liberty provided a corrected version of Table 9-21, Table 9-24, Table 9-25, Table 9-26, Table 9-27, and Table 9-28. **Liberty must revise Tables 9-21, 9-24, 9-25, 9-26, 9-27, and 9-28 to include the corrected information as provided in the responses to Data Request OEIS-P-WMP_2025_LU-002, Question 4 and OEIS-P-WMP_2025-LU-004, Question 2.**

[106] Response to DR-002, question 1.

[107] Response to DR-002, question 2.

[108] Response to DR-002, question 4.

[109] Response to DR-004, question 2.

Section	WMP Page Number	Correction or Clarification
9.13.1 Recruitment	211	In its response to Data Request OEIS-P-WMP_2025-LU-007 Question 6,[110] Liberty provided a corrected version of Table 9-32 "Liberty VM Credentials or Certifications." **Liberty must revise Table 9-32 to have the corrected information provided in response to Data Request OEIS-P-WMP_2025-LU-007, Question 6.**

[110] Response to DR-007, question 6.

5. Conclusion and Next Steps

An electrical corporation must respond to areas for continued improvement identified by Energy Safety.[111] A lack of or incomplete response to areas for continued improvement may result in critical issues in the electrical corporation's WMP.[112] Energy Safety may issue a Revision Notice to an electrical corporation with critical issues in its WMP to direct the electrical corporation to modify its WMP submissions. Not responding fully to critical issues identified in a Revision Notice may result in a denial of the WMP.[113]

In the Decision on Liberty's 2025 WMP, Energy Safety identified that "[a]t this point in Liberty's maturity, Energy Safety expects Liberty to be able to deliver plans that demonstrate forward-looking growth and address the areas for continued improvement identified by Energy Safety," and that Energy Safety would closely review "whether Liberty has demonstrated continued progress and forward-looking growth between its prior WMPs and its 2026-2028 Base WMP."[114]

Liberty's failure to fully respond to the areas for continued improvement detailed in prior years' Revision Notices and Decisions are the basis for four of the critical issues identified in its 2026-2028 Base WMP. Three of the four issues have been ongoing for more than 2 years, since its 2023-2025 Base WMP. In addition to the four long-standing issues, Energy Safety identified six new critical issues. These issues indicate that Liberty is not demonstrating continued progress or forward-looking growth in several aspects of its WMP. This lack of growth means Liberty is not progressing in its plan to minimize the risk of catastrophic wildfire posed by its electrical lines and equipment.

Liberty must submit its Revision Notice Response along with a clean revised 2026-2028 Base WMP and a redlined revised 2026-2028 Base WMP to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs).

For the critical issues identified, Energy Safety sets forth specific remedies that Liberty must fully address and respond to within its Revision Notice Response.[115] Liberty must also correct the errors identified in Section 4.

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[111] WMP Guidelines, pages 9-10.

[112] WMP Guidelines, pages 9-10.

[113] WMP Guidelines, page 9.

[114] Decision on Liberty 2025 WMP Update, page 65.

[115] WMP Guidelines, pages 9-10.

Stakeholders and members of the public may submit opening and reply comments on Liberty's Revision Notice Response in accordance with Section 4 of the Energy Safety Policy Division Process Guidelines,[116] pursuant to the schedule below. Opening and reply comments must be submitted to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs). Reply comments must be limited to issues raised and representations made in the opening comments.

The schedule for Liberty's Revision Notice Response and Draft Decision is as follows:

Liberty Revision Notice Response and Revised WMP Due	November 20, 2025
Opening Comments Due	December 10, 2025
Reply Comments Due	December 21, 2025
Energy Safety Draft Decision Issued No Later Than	March 2, 2026

[116] Policy Division Process Guidelines, pages 2-4.

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Appendix A: References Table

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BVES 2026-2028 Base WMP	Bear Valley Electric Service, Inc., Bear Valley Electric Service 2026-2028 Wildfire Mitigation Plan (2026 Rvision 0), Published April 18, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58293&shareable=true).
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