TABLE OF CONTENTS

LIST OF TABLES

1. Liberty Revision Notice Responses

1.1 Critical Issue RN-LU-26-01

Critical Issue Title: Liberty's risk modeling framework and calculations overemphasized Public Safety Power Shutoff (PSPS) and outage risk.

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;
    - 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.

Remedy Response:

Liberty will modify its risk modeling framework and calculations to ensure PSPS and outage risk are appropriately weighted.

1. Plan to Adjust Wildfire and Outage Risk Scoring Methodology

Specifically, Liberty will revise its 2026-2028 Base WMP to adjust the wildfire and outage risk scoring methodology to further improve the calculations and scaling of outage risk as part of its Risk Assessment Improvement Plan. This plan will address the elements identified above.

In response to this Revision Notice and as part of this plan, Liberty has tailored the objectives of a series of meetings with Direxyon to further review the risk modeling methodology. These meetings include evaluations of the current scaling and weighting of various consequence and probability metrics for both wildfire and outage program risks. In its reporting and as directed, Liberty will discuss the validity of its current methods and the anticipated changes.

To refine Liberty's risk scoring methodology, Liberty has and continues to review the scaling and weighting factors used by other large electrical corporations. Liberty uses this data as resource benchmarks. Subject matter experts will peer review the reconfigurations to confirm that the updated methodology will be an improvement. Expected improvements include, but are not limited to:

- Calculate Wildfire Risk by utilizing a Summation of Probability of Ignition and Probability of Asset Failure rather than an average;
- Calculate Outage Program Risk by utilizing a Summation of PSPS Risk and SRP Risk rather than an average;
- Calculate Overall Utility Risk by utilizing a Summation of Wildfire Risk and Outage Program Risk rather than an average; Subject matter expert validation of model outputs for more accurate application of risk metrics;
- Incorporation of historical weather data to enhance modeling of asset failure risk; and
- Shifting calculation of risk scores based on the probability of one fire to the number of potential fires per circuit to align more closely with the methodology used by other utilities.

To further refine its wildfire and outage risk scoring methodology, Liberty continues to coordinate with other utilities through the joint IOU working group meetings and targeted sessions to develop benchmarks and better understand effective methodologies and practices so that Liberty can continue to refine its practices.

In addition, Liberty will seek to include additional historical weather data from its weather station network, validation of the weighting applied to the probability of ignition, and tracking of asset evolution through annual data updates.

As a part of this plan, outage and PSPS risk models will be enhanced to include weather scenarios for more accurate failure estimation so that all risk categories are represented more appropriately.

Liberty provides additional detail regarding the Risk Assessment Improvement Plan, including an implementation timeline and milestones, in its response to Critical Issue RN-LU26-02.

Liberty is committed to refining its wildfire risk model. To support Liberty's objective, Liberty has created an internal risk analyst position that is dedicated to overseeing model enhancement development, processing, and validation. This position is expected to be filled in the coming months.

2. Interim recalculation of risk score calculations and rankings using only wildfire risk throughout Liberty's 2026-2028 Base WMP

Liberty revised its methodology and recalculated risk scores and rankings using only wildfire risk throughout its 2026-2028 Base WMP and will adjust mitigation activities as needed in its 2027 and 2028 WMP Updates. Improvements made to the risk calculation methodology for wildfire risk include utilizing summation of Probability of Ignition and Probability of Asset Failure rather than averaging, shifting from calculation of risk scores based on the probability of one fire to the number of potential fires per circuit, and applying a wind factor based on weather station data to the calculation of asset failure risk. Liberty did not make any adjustments to its targets in its 2026-2028 Base WMP based on the updated risk scores. Liberty will make mitigation activity adjustments as needed as part of the Risk Assessment Improvement Plan detailed in its response to Critical Issue RN-LU26-02. Liberty has updated the following tables and figures in its 2026-2028 Base WMP to reflect the interim recalculations:

- Table 5-6: Liberty Top-Risk Circuits (now Table 5-5);
- Table 6-1: Circuit Prioritization List Based on Overall Utility Risk;
- Table 6-2: Initiative Activities for Risk Drivers of Prioritized Circuits (now LU Table 6-1);
- Figure 6-2: Projected Overall Service Territory Wildfire Risk;
- Table 6-4: Risk Impact Activities (now Table 6-3);
- Table 6-5: Summary of Risk Reduction for Top Circuits (now Table 6-4);
- 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

1.2 Critical Issue RN-LU-26-02

Critical Issue Title: Liberty's description of its risk model validation reporting and internal review processes were vague and lacked the detail necessary for progress tracking.

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.

Remedy Response:

Liberty further supplements the information about its risk model validation reporting and internal review processes identified in its WMP below.

1. Documentation from Liberty's Internal Risk Focus Group

After filing its 2025 WMP Update in September of 2024, Liberty held several internal meetings, with risk modeling consultants and joint utility working groups to review risk model roadmap planning, refine risk metrics, and guide model development decisions. Table 1-1 provides a summary of these meetings. Supporting documentation, findings, and reports related to risk models were generated by Liberty's risk modeling consultants, Technosylva and Direxyon. Refer to Appendix B for wildfire risk modeling technical reports from Technosylva and Direxyon, including an updated document from Direxyon to capture the changes made in this revision notice.

Table 1-1: Documentation of Liberty Meetings Focused on Wildfire Risk Modeling

Meeting Subject	Occurrences	Timing	Topics
Liberty/Direxyon - Weekly synch	20	Weekly since November 2024	Roadmap planning, refining risk metrics, SME knowledge transfer, and leveraging Direxyon for WMP development, data requests, and business case analysis.
Liberty FireSight/FireRisk Bi-Weekly Meeting	15	Bi-Weekly since October 2024	Reviewed FireSight and FireRisk integration, wildfire risk modeling, and alignment of Technosylva outputs with WMP reporting and operational use.
Joint IOU Mitigation Effectiveness	11	Monthly Since October 2024	Evaluate overhead system hardening, maintenance and replacement, situational awareness mitigations, undergrounding effectiveness, protective device settings, and emerging technologies, while analyzing mitigation impacts on wildfire and PSPS risk. Meetings included other IOUs.
Risk Modeling Working Group	10	Monthly since January 2025	Reviewed risk modeling frameworks, validate methodologies, and align CPUC requirements for wildfire risk assessment. Meetings include OEIS, IOUs and SMEs.
Liberty/TSYL Monthly Check-in	6	Monthly since May 2025	Technosylva provided updates about products and metrics. Liberty provided updates to utility data, reviewed updates for resolving bugs, and product overview to Liberty Risk Focus Group.
DIREXYON - Phase 3	4	September - November 2024	Liberty Risk Focus Group and Direxyon developed Scope of Work for Phase 3 of development of the DRAT risk model.
WMP Section 6	2	May 2025	Liberty Risk Focus Group working session for 2026-2028 Base WMP to align with Planning/Engineering/Operations to utilize the DRAT outputs for prioritizing work.
Liberty <> Direxyon	2	May 2025	Liberty Risk Focus Group and Direxyon reviewed circuit risk ranking outputs for 2026-2028 Base WMP.

Meeting Subject	Occurrences	Timing	Topics
Direxyon Risk Outputs and Next Steps	1	September 10, 2024	Reviewed Covered Conductor and Traditional Hardening risk scores comparison and finalized the next steps with Direxyon to schedule Phase 3 of model development.
Discussion of wildfire risk modeling results and utilization for grid hardening plans	1	December 3, 2024	Discussed the status of Liberty's wildfire risk modeling work and next steps for internal utilization of the results, in accordance with WMP requirements. This meeting focused on how to utilize risk outputs for planning and grid hardening.
Discussion on RMWG Meeting Organization (Liberty)	1	December 5, 2024	Information gathering on RMWG meeting organization and structure for Liberty to provide feedback of the meetings to Jensen Hughes.
WMP data discussion liberty utilities	1	February 13, 2025	Liberty Risk Focus Group and PG&E assessed benchmark calculations of wildfire mitigation effectiveness.
Utility Wildfire, Weather, and Analytics Summit	1	April 16-17, 2025	Meeting with other utilities, meteorologists, and fire scientists to discuss best practices for weather and wildfire modeling.
Liberty workshop	1	May 7, 2025	Liberty Risk Focus Group and Direxyon met to review DRAT Phase 3 model scenarios.
Risk Working Group	1	May 9, 2025	Liberty Risk Focus Group working session for 2026-2028 Base WMP.
Liberty - Report Phase 3	1	May 12, 2025	Liberty Risk Focus Group and Direxyon met to review DRAT Phase 3 Report prepared by Direxyon.
Liberty - Phase 3 + SRP + WMP	1	May 16, 2025	Liberty Risk Focus Group and Direxyon met to review DRAT Phase 3 Outage Program Risk.
WMP Risk Sections Content	1	May 19, 2025	Liberty Risk Focus Group working session for 2026-2028 Base WMP.
Discuss WMP Risk Modeling Results for 2026-2028 WMP	1	May 19, 2025	Reviewed DRAT Phase 3 outputs and results for 2026-2028 Base WMP.

Meeting Subject	Occurrences	Timing	Topics
Wildfire Risk Modeling	1	May 29, 2025	Webinar focused on advanced analytics and modeling techniques and an abundance of data allow support improved understanding of risk assessment and how risk assessments are driving wildfire mitigation decisions.
Final Run Through of WMP Risk Chapters	1	May 29, 2025	Liberty Risk Focus Group working session for 2026-2028 Base WMP.
Liberty <> Direxyon QDR Risk Report	1	June 12, 2025	Updated risk scoring as a part of the QDR per what was submitted in the 2026-2028 WMP.
Risk Event Table	1	July 7, 2025	Liberty Risk Focus Group and Direxyon reviewed DRAT Phase 3 simulation results.
Follow-up on the Report and Next Steps	1	July 11, 2025	Liberty Risk Focus Group and Direxyon reviewed the DRAT Phase 3 Report and discussed next steps for model improvement and future enhancements.
Technosylva Data Plans	1	September 25, 2025	Liberty Risk Focus Group and Technosylva developed forward looking plan for frequency of data updates, and assessed usage of the tools being provided.
Technosylva Webinar: FPI Model Development and Operational Use	1	October 30, 2025	Webinar on Technosylva's Fire Potential Index (FPI) development, evolution, and intended use.

The collaborative meetings identified above supported Liberty's commitment to continuous improvement and refinement of both the technical and operational aspects of the risk model. The meetings facilitated a comprehensive approach to risk modeling by encouraging cross-functional feedback, as described below.

- Implementation of DRAT Phase 3 risk model framework
    - Risk scope expansion to include multi-hazard risk types for storms, equipment failure, and outages;
    - Addition of outage risk, including cost of repairs and customer impact;
    - Cost integration of capital vs. operations and maintenance expenses;
    - Incorporation of crew size for cost calculations;
    - Decision optimization based on prioritization for maintenance and repair planning to align with budgets ;

    - Addition of risk modules for PSPS, SRP, secondary conductor, and tree attachments
- Identification of future enhancements
    - Automate geospatial ETL pipeline for data ingestion;
    - Additional asset types such as relays, switches, transformers, and underground conductor;
    - Enable snapshotting for historical model performance tracking;
    - Conduct retrospective analysis for continuous improvement;
    - Update FireRisk with Liberty PSPS zones
- Updates and data refreshes made to Technosylva FireSight and FireRisk
    - Updated FireRisk and FireSight with updated asset data and outage data;
    - Updated FireSight data run and FireSight app update;
    - Identified and fixed bugs identified through FireSight Web User Acceptance Testing Plan including issues with uploading local files and saving layers
    - FireSight and FireRisk training for Liberty employees
- Benchmarking with other IOUs
    - Risk event driver comparison
    - Undergrounding effectiveness
- Reports and Whitepapers
    - WMP Model Documentation_TSYL_2024_Appendix
    - Direxyon Report Phase 3_v2
    - Dynamic Grid Management Technologies Reduce Wildfire Adaptation Costs in the Electric Power Sector
    - EPSS Effectiveness Metric Enhancement
    - Direxyon Wildfire Risk calculation – Liberty
    - Presentation of Phase3 and WMP Support results

Liberty further supplements Section 5.6.1 of its Base 2026-2028 WMP, as follows:

- **Data input review**: Prior to providing data to Direxyon, Liberty performs review of all data manually and by utilizing database validation. Manual review is conducted in correlation with operational sources for correctness of work completed, empty fields, and aggregated correctness. Database validation checks refer to ensuring the data does not have duplicates, ambiguities, or format discrepancies.
- **Model reviews**: Liberty has undergone heavy development of its risk modeling efforts and seeks to continue to improve its efforts. For example, Outage Program Risk and PSPS Risk are outputs developed for the 2026-2028 WMP and need a thorough review

and validation to be considered fully useful to risk based decision making. As mentioned in Section 5.7 Risk Assessment ID RA2 and RA6, a focused internal resource will be hired to thoroughly validate outputs and generate outputs. Direxyon and Liberty subject matter expert validation for model characteristics will ensure alignment with Liberty's processes are present in the model.

2. Risk Assessment Improvement Plan

Liberty is committed to improving its risk model methodologies and outputs. The following is Liberty's updated Risk Assessment Improvement Plan. The 2026-2028 Base WMP, including Table 5-7, have been updated accordingly.

Liberty has made continual advancements in its RBDM framework. Through many iterations throughout the development, Liberty has continued to improve upon its probabilistic and consequence modeling capabilities to encompass the WMP guidelines. As a part of this WMP, Liberty is now looking to enhance these capabilities by establishing clear roles and responsibilities, and to establish clear and documented processes to continually evaluate, improve, and produce better risk modeling results. This includes finetuning its business processes for the consumption and analysis of the data as well as look for opportunities to tune the technical capabilities through validation and review of the tools it has developed.

Goal: Develop and continually improve, both programmatically and technically, the risk assessment tool to implement risk-based decision making into the business planning and operations processes.

<u>RA-1 through RA-5, Continuous Improvement:</u>

Problem Statement: While Liberty has developed the risk assessment tool and begun to produce and evaluate the results, it's important that Liberty establish a programmatic and repeatable documented process to enable continued and structured improvement.

Planned Improvement: The following five, RA-1 through RA-5, actions will be implemented as part of this WMP to further formalize and establish continued improvement controls to the risk assessment tool and the subsequent results.

Anticipated Benefits: Improved results will allow Liberty to make more informed business, design, and operational decisions based on risk.

- RA-1, Data Quality and Data Input: Establish a process to continually test data quality and data input to improve the results of the tool. This is a programmatic and technical improvement to continually test and improve the data. Data will be tested annually, or more frequently, and the first test will be performed in 2026.

- RA-2, Risk Assessment Methodology: Establish a process to continually test the risk modeling methodology and benchmark with peer utilities. Include wildfire and PSPS risk assessment documentation, including both quantitative and qualitative approaches. This is a programmatic and technical improvement to continually improve the risk calculations and model. The methodology will be tested annually, or more frequently, and the first test will be performed in 2026.

- RA-3, Evaluate and Improve Results: Establish a feedback loop with subject matter experts to continually test and improve the results of the risk tool. This should include presentation of risk, including dashboards and assessments. This is a programmatic and technical improvement to continually improve the results of the risk assessment tool. The results, including the top-risk circuits list, will be tested annually, or more frequently, and the first test will be in 2026.

- RA-4, Risk Event Tracking and Testing: Establish a process to track and reconstruct risk events for the purpose of integrating lessons learned and improvement. This is a programmatic and technical improvement to continually improve the results of the risk assessment tool. Liberty will establish this process and test it through the reconstruction of a risk event to integrate lessons learned. The initial risk event reconstruction and testing will be completed in 2026.

- RA-5, Use the Results to Inform Decision Making and Design Basis: Establish a cadence to present and deliver the results with business planners and operators to be incorporated into the decision-making and design process. This should include justification for design basis scenarios. This is a programmatic improvement to advance risk-based decision making. The risk assessment results will be produced annually, or more frequently, so Liberty can better inform the WMP Updates, including the 2027 Update, and subsequent Updates and Base Plan submittals.

RA-6 through RA-7, Immediate Improvement:

Problem Statement: Liberty is a small utility with limited resources, however, to more notably drive improvement with the risk assessment tool, a dedicated resource, with clear roles and responsibilities is necessary.

Planned Improvement: A resource will be onboarded and assigned the role of lead risk analyst to accelerate the improvement of Liberty's risk assessment tool.

Anticipated Benefits: Dedicating an employee to focus on and execute continual improvement actions will lead to better tool and subsequent results.

- RA-6, Establish Clear Roles and Responsibility to Drive Improvement: Assign a dedicated resource the responsibility of improving and delivering risk-based results for better decision making. Place an emphasis on data quality, methodology, and subject matter expert and industry tested results. This is a programmatic improvement to advance the tool and accelerate the utilization of risk-based decision making. Liberty will onboard the dedicate resource by Q2 2026 with an established role and responsibilities. Further, to ensure continued improvement, Liberty will finalize a documented procedure that compliments the continuous improvement portion of this Risk Assessment Improvement Plan by Q3 2026.

Problem Statement: Liberty's outage and PSPS risk results need improvement.

Planned Improvement: Liberty plans to action the items above to improve the outage and PSPS risk results.

Anticipated Benefits: Improved outage and PSPS results will improve the quality of the overall utility risk results. Improved results will allow for more informed business, design, and operational decision making. When the results are trusted by the subject matter experts, the program and tool will build acceptance and advance the associated risk mitigation.

- RA-7, Evaluate and Improve the Outage Risk Results: Evaluate and improve the calculation and scaling of outage risk including, but not limited to,
    - 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;
- Coordination with other electrical corporations to determine methodology for scaling and weighting of risk metrics;

This is a technical improvement to improve the outage and PSPS risk results. These improvements will be complete so the updated results can be included in the 2027 WMP Update.

1.3 Critical Issue RN-LU-26-03

Critical Issue Title: Liberty's risk reduction assessment lacked maturity and did not accurately assess mitigation activities' effectiveness.

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

- Recalculate risk reduction values using only wildfire risk and excluding outage risk.
    - 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.

Remedy Response:

1. Recalculation of risk reduction values using only wildfire risk and excluding outage risk.

Liberty has performed a recalculation of risk reduction values using only wildfire risk and excluding outage risk. The updated values reflect these recalibration efforts discussed in Liberty's response to RN-LU-26-03. Additionally, Liberty re-evaluated the risk impact of inspection activities and subsequently removed risk reduction scores for inspection efforts. The removal of risk scores from inspection activities is due to the fact that inspections alone do not impact risk directly. Inspections inform other activities that reduce risk. The updated risk scores

are provided in new versions of figures and tables found herein and in Liberty's revised, 2026-2028 Base WMP.

2. Evaluation of the number of risk model scenarios and validation necessary for more accurate representations of mitigation activity effectiveness values.

Liberty evaluated the iterations that are ran per scenario to analyze the ability to produce more accurate representation of mitigation activity effectiveness values. Running one simulation, iterations of 1, 5, 10, 100, 500, and 1000 were ran to evaluate difference of outputs for fire risk. A significant difference is shown in the table below between 1 to 100 iterations and the averages begin to converge when 100 or greater iterations are introduced to the scenarios. A marginal difference of approximately 0.05% between 100 and 1000 iterations and approximately 0.1% between 100 and 500 iterations. The largest difference in running more iterations is the resource intensiveness of memory, and CPU where there is a linear association with number of iterations. For example, as shown in Table 1-2, when there are greater than 100 iterations the runtime multiplies due to the amount of data that is being processed. Through this analysis, Direxyon and Liberty have determined that the cost-benefit is maximized at 100 iterations per simulation due to the marginal gain in risk score outputs when greater than 100 iterations are in a scenario.

Table 1-2: Average of Fire Risk Difference in Simulation Iterations

Simulation Time	# Iterations	2025	2026	2027	2028
10 minutes	1 iteration	2.485653701	1.655182502	1.38056861	1.558807444
10 minutes	5 iterations	2.289679696	1.565614197	1.455803244	1.523044144
10 minutes	10 iterations	2.46766478	1.2570631	1.519357357	1.410381925
20 minutes	100 iterations	2.433208885	1.401156483	1.310518256	1.326447761
2 hours	500 iterations	2.429169504	1.402042353	1.331235099	1.32794212
5 hours	1000 iterations	2.430814378	1.393005044	1.325542248	1.326524299

3. New versions of the Liberty figures and tables with updated values for risk reduction or mitigation effectiveness based on running additional scenarios.

Liberty provides updated values for risk reduction or mitigation effectiveness based on running additional scenarios in new versions of the following figure and tables:

- Table 5-6: Liberty Top-Risk Circuits (now Table 5-5);
- Table 6-1: Circuit Prioritization List Based on Overall Utility Risk;
- Table 6-2: Initiative Activities for Risk Drivers of Prioritized Circuits (now LU Table 6-1);
- Figure 6-2: Projected Overall Service Territory Wildfire Risk;
- Table 6-4: Risk Impact Activities (now Table 6-3);

- Table 6-5: Summary of Risk Reduction for Top Circuits (now Table 6-4);
- 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

1.4 Critical Issue RN-LU-26-04

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

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.

Remedy Response:

1. Ignition Reduction Effectiveness for the projects and activities in Appendix D: Table 1-2

In its response to area for continued improvement LU-23B-06, Liberty calculated the ignition reduction effectiveness for two projects in Appendix D: Table 1-2, the Tahoe Vista Rule 20 project and the Stateline Resiliency project. After recalibrating the risk model and methodology for calculating wildfire risk, Liberty is providing an updated table that includes the ignition reduction effectiveness of various scenarios for the Stateline Resiliency project. These scenarios include probability of fire calculations of no replacement with and without SRP as well as normal replacement (bare wire), covered conductor, and underground conductor with and without SRP. The scenario of not replacing the conductor without SRP enabled was used as the baseline against which all other scenarios were compared. In all scenarios in which the conductor is replaced, there is a greater than 14% reduction in the probability of fire. Covered conductor and normal replacement show similar risk reduction results. Scenarios of covered conductor and normal replacement with SRP resulted in increased risk reduction than without SRP. Both the scenario of underground conductor with SRP and underground conductor without SRP resulted in the greatest risk reduction for the project. See Table 1-3 below for the ignition reduction effectiveness results.

To calculate the ignition reduction effectiveness, Liberty used the following calculation:

((Baseline – Scenario) / Baseline) * 100 = % Ignition Risk Reduction

Table 1-3: Effectiveness of Activities for the Stateline Resiliency Project

Scenario	Probability of Fire	% Ignition Risk Reduction
No Replacement Without SRP (baseline)	0.001400853	0.00%
No Replacement With SRP	0.001370988	2.13%
Covered Conductor Without SRP	0.001200451	14.31%
Normal Replacement Without SRP	0.001192315	14.89%
Covered Conductor With SRP	0.001128903	19.41%
Normal Replacement With SRP	0.001123307	19.81%
Underground Conductor Without SRP	0.001093527	21.94%
Underground Conductor With SRP	0.000993525	29.08%

2. Considerations of various ignition risk drivers, deployment time and resources, performance comparison in forested versus non-forested areas, and risk model output of riskiest areas and discussion of how Liberty determines covered conductor targets.

For the 2026–2028 WMP cycle, Liberty adopted a hybrid prioritization strategy that combines subject matter expertise with historical and emerging data. This approach is being applied while Liberty is advancing development of enhancements to enable circuit-segment-level risk analysis within the Direxyon platform.

Covered conductor and traditional overhead hardening project selection begins with Liberty's Tier 3 High Fire-Threat District (HFTD) circuits and expands to include Liberty's top risk circuits identified through risk modeling. Top risk circuits with indicators of elevated risk are prioritized to achieve the greatest ignition risk reductions. Risk drivers for circuits considered in the risk model and by Liberty's subject matter experts include:

- Results from asset inspections;
- Age of assets;
- Probability and Consequence of Ignition from Technosylva wildfire risk models;
- Meteorological data such as historical wind gusts;
- Vegetation density;
- Overhead conductor span length;
- Fuse type;
- Number of tree attachments; and
- Outage data.

Liberty's current covered conductor projects were initiated before Liberty's risk-analysis framework was operational. Liberty is now transitioning to a quantitative, model-driven process for project selection and prioritization. The next phase of Direxyon development is expected to be operational during this WMP cycle and will provide segment-level ignition-reduction effectiveness calculations by comparing baseline risk to post-mitigation scenarios for each alternative, including covered conductor, undergrounding, and traditional hardening. Liberty has completed SRP implementation throughout its system and risk modeling refinement is being conducted to quantify the risk reduction of these alternative scenarios in combination with SRP enabled.

As this data matures, Liberty will use it to prioritize segments where model outputs indicate the highest expected risk reduction per dollar spent; integrate GO 165 findings and vegetation exposure to identify segments where conductor replacement addresses both wildfire risk and asset condition needs; and set annual covered conductor targets by aligning these high-priority segments with available construction resources, permitting timelines, and budget constraints. Table 1-4 provides a comparison of deployment time considerations for grid hardening initiatives.

Table 1-4: Summary of Project Timelines for Grid Hardening Initiatives

Mitigation	Initiate	Planning	Schedule	Execute	Total Duration
Sensitive Relay Profile (SRP)	1-2 months	1-2 months	1-2 months	1-3 months	4-8 months
Traditional Overhead Hardening	2-3 months	4-9 months	4-9 months	4-12 months	12-30 months
Covered Conductor	2-3 months	9-18 months	9-18 months	4-9 months	24-48 months
Undergrounding	3-6 months	12-24 months	12-24 months	9-18 months	36-72 months

As demonstrated by recent risk modeling results, the risk mitigation effectiveness of covered conductor and traditional overhead hardening (normal replacement) provide similar results. As part of its plan to improve the risk model, Liberty will work to validate and recalibrate results as model enhancements continue. Traditional overhead hardening may be the preferred mitigation activity due considerations of cost, maintenance, and inspection requirements; however, forested vs. non-forested areas will influence which mitigation approach is selected. In non-forested areas, such as Topaz and Markleeville, Liberty may choose traditional overhead hardening, because there is more opportunity to design the project with additional poles and wider crossarms. Where possible, Liberty will install additional poles to create shorter span lengths, and wider crossarms to increase the distance between phases of conductors to

minimize the likelihood of wire-to-wire contact during high wind events which can lead to an ignition. In heavily forested areas, such as South Lake Tahoe and Meyers, there is less opportunity for installing additional poles and wider crossarms due to presence of large trees, which removal may not be possible due to environmental permitting constraints or not prudent due to increased vegetation management costs. Where traditional overhead hardening is not feasible due to these constraints, covered conductor is an alternative mitigation activity.

For the remainder of the 2026–2028 WMP cycle, Liberty will continue using the hybrid method, combining HFTD Tier 3 circuits, recent risk event data, and circuit-level analysis to scope and sequence projects while refining segment-level model precision. Liberty will document and validate the quantitative ignition-reduction effectiveness for SRP, covered conductor, and traditional hardening alternatives, and incorporate forested versus non-forested performance comparisons once the model outputs are available at sufficient spatial resolution.

This evolving process will allow Liberty to continue to set mitigation targets that remain both defensible and proportionate to its small rate base, balancing affordability with the highest achievable ignition-risk reduction across its approximately 700 miles of primary distribution.

Liberty has updated its response to LU-23B-06 in Appendix D of its 2026-2028 Base WMP.

1.5 Critical Issue RN-LU-26-05

Critical Issue Title: Liberty's response to area for continued improvement LU-25U-04 "Cost-Benefit Analysis for the Stateline Resiliency Project," was insufficient.

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.

Remedy Response:

1. Lessons learned from the Tahoe Vista Project

The Tahoe Regional Planning Agency (TRPA) imposes a "construction season" for the Lake Tahoe Basin, which effectively limits when major earthwork, grading, and ground-disturbing construction can occur because of weather, runoff and environmental protection concerns. In addition to the limited window that such work is permitted to be done in the area, Caltrans permitting delays caused the Tahoe Vista Project to be deferred.

While Liberty had strong early coordination with Caltrans and proactively engaged contractors, Liberty identified several areas to further streamline similar projects going forward. These include: securing MSAs with qualified civil contractors in advance to reduce procurement cycle time; confirming contractor availability earlier in the season; refining how and when RFPs are issued so contractors have sufficient information to bid even while Caltrans permit conditions are still being finalized; improving early understanding of Caltrans traffic-control and lane-closure requirements during project development; and engaging civil contractors during design to ensure constructability and permit feasibility are fully aligned before bid and award. These refinements will help avoid compression of the permit–procurement timeline and better position future undergrounding and Rule 20 projects for successful execution within the short seasonal work window.

2. Cost Benefit Analysis

Table 1-5 provides the cost benefit analysis for the Stateline Resiliency Project where benefit is expressed as risk effectiveness achieved per million dollars spent. To calculate the cost benefit, Liberty used the following formula:

$$\frac{\frac{(Effectiveness\ Baseline\ -\ Effectiveness\ Scenario)}{Effectiveness\ Baseline}}{\frac{Estimated\ Cost}{1{,}000{,}000}} = Benefit\ Per\ \$1{,}000{,}000$$

Table 1-5: Cost Benefit Analysis of Stateline Resiliency Project

Scenario	Risk Effectiveness	Estimated Cost	Benefit Per $1,000,000
No Replacement Without SRP (baseline)	0.00000	$0	N/A
Normal Replacement With SRP	0.19813	$926,564.26	0.21383
Normal Replacement Without SRP	0.14886	$926,564.26	0.16066
Covered Conductor With SRP	0.19413	$2,454,342.00	0.07910
Covered Conductor Without SRP	0.14306	$300,000.00	0.07106
No Replacement With SRP	0.02132	$4,500,000.00	0.06462
Underground Conductor With SRP	0.29077	$2,454,342.00	0.05829
Underground Conductor Without SRP	0.21939	$4,500,000.00	0.04875

Liberty based its cost estimates for the normal replacement and covered conductor scenarios on historic costs of similar projects in the area. Due to limited availability of cost data for underground construction, Liberty used preliminary cost estimates and subject matter expertise to arrive at an estimated cost of $4.5 million for the underground conductor scenario. The cost for SRP is approximately $150,000 per circuit. Since Liberty has already completed SRP enablement on the two circuits that make up the Stateline Resiliency Project, the $300,000 cost was only included in the scenario of “No Replacement With SRP” and was not added to the other scenarios.

Covered conductor cost was calculated by the use of data for 13 covered conductor projects that have been recently completed or have a budgeted cost to complete associated with them. These projects total nearly 16 miles of covered conductor and more than $30 million of capital deployment. The average cost per mile for these projects is approximately $2.2 million. Due to differences in location, access, and permitting of covered conductor projects, there is more variability in cost per mile. After removing the highest cost per mile project of $4.8 million and the lowest cost per mile project of $1.2 million, Liberty arrived at an average cost per mile of $2,045,285.00. For 1.2 circuit miles, the estimated cost is $2,454,342.00. Table 1-6 provides

details of the cost of the 13 projects used to arrive at the estimated project cost for the covered conductor scenarios.

Table 1-6: Covered Conductor Cost Analysis

Project Name	Cost	Mileage	Cost per Mile	Cost per Mile (less min & max)
Celio A	$1,946,230	1.6	$1,208,839	Min (removed)
Celio B	$1,388,530	0.9	$1,493,043	$1,493,043
Fallen Leaf B	$3,144,944.78	1.5	$2,055,519	$2,055,519
7300 Ph7	$2,597,379.06	0.8	$3,246,724	$3,246,724
7300 Ph8	$2,453,122.32	1.0	$2,528,992	$2,528,992
Angora (Ph 1 & Ph2)	$4,703,935.39	1.8	$2,613,297	$2,613,297
Fallen Leaf C	$2,610,974.74	1.5	$1,740,650	$1,740,650
7300 Ph9	$1,840,773	0.4	$4,844,139	Max (removed)
Fallen Leaf D	$3,552,550	2.1	$1,691,690	$1,691,690
7300 Ph10	$1,040,000	0.8	$1,300,000	$1,300,000
7300 Ph11	$1,920,000	1.1	$1,777,778	$1,777,778
Spring Creek Tract	$2,664,411	1.5	$1,776,274	$1,776,274
Fir Craggs	$1,591,917	0.7	$2,274,167	$2,274,167
Average Cost Per Mile			$2,196,239	$2,045,285

Normal replacement cost was calculated by the use of data for 5 overhead line rebuild projects that have recently been completed. These projects total approximately 13 miles of primary overhead conductor and nearly $7 million of capital deployed. The average cost per mile of these projects was approximately $515 thousand per mile. These projects were completed outside of the Tahoe Basin where there is less complexity due to roadside access, less vegetation, and less permitting requirements. The Stateline Resiliency Project is in South Lake Tahoe which adds costs due to being more forested, complex permitting requirements, and additional considerations for limited operating periods, and traffic management. Taking these additional considerations into account, Liberty added a 1.5X multiplier to the average cost per mile and arrived at an estimated cost per mile of $772,136.88. For 1.2 circuit miles, the estimated cost is $926,564.26. Table 1-7 provides details of the cost of the 5 projects used to arrive at the estimated project cost for the normal replacement scenarios.

Table 1-7: Normal Replacement Cost Analysis

Project Name	Cost	Mileage	Cost per Mile	1.5 X Multiplier for Tahoe Basin
Eastside Lane Tap Rebuild	$1,194,003.98	2.3	$523,686	
Cunningham Tap Rebuild	$1,869,373.53	3.8	$494,543	
Larson Lane Tap Rebuild	$1,739,611.53	3.4	$508,658	
Topaz Lane Tap Rebuild Ph1	$791,373.17	1.5	$517,237	
Topaz Lane Rebuild Ph2	$1,106,999.16	2.1	$529,665	
Average Cost Per Mile			$514,758	$772,137

Liberty has updated its response to LU-25U-04 in Appendix D of its 2026-2028 Base WMP.

1.6 Critical Issue RN-LU-26-06

Critical Issue Title: Liberty's response to area for continue improvement LU-23B-10 "Distribution Detailed Inspection Frequency," was insufficient.

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, RK7202, TAH7200, T640, CEM41, T608, POR3100, SQV8300, HOB7700, T619, CEM42, T132, POR3200, STL2200, WSH201, STL3101.

Remedy Response:

1. Plan to increase Liberty's detailed distribution inspection frequency during the 2026-2028 WMP cycle.

Beginning in 2026, Liberty plans to add annual drone inspection for all distribution and transmission circuits within its HFTD-3 zone. HFTD-3 is designated by the California Public Utility Commission as having extreme wildfire risk. Based on the updated risk assessments performed as part of this revision notice, to include only wildfire risk, there is notable overlap between the riskiest circuits and circuits located within the HFTD-3 zone. Liberty will focus this incremental drone inspection program on the HFTD-3 zone, however as Liberty's risk assessment results continue to mature per the Risk Assessment Improvement Plan, Liberty will consider adjusting its drone inspection program based on the risk results. This incremental detailed drone inspection program is intended to proactively identify Level 1 and 2 conditions, as defined by General Order 95.

2. Plan to implement additional inspection programs that proactively identify Level 1 and 2 conditions during the 2026-2028 WMP cycle.

Liberty is planning to utilize drone inspections to identify Level 1 and 2 conditions as well. As part of this effort, Liberty has connected with drone inspection service vendors as well as other utilities performing drone inspections to educate itself on best practices and areas of improvement in the use of drone inspections. For example, in October of 2025, Liberty sent a request for information to nearly two dozen inspection service vendors to assess what services and capabilities best suit Liberty's needs. Subsequently, Liberty will be initiating a request for proposal in December of 2025. Liberty has requested the drone services include thermal detection capabilities.

Liberty plans to identify and partner with a full-service drone inspection entity by the Spring of 2026. The plan is to implement annual, detailed, drone inspection on all distribution and transmission circuits within Liberty's HFTD-3 zone, beginning in 2026. There are approximately 127 miles of transmission and distribution circuits, including approximately 1,682 poles, in Liberty's HFTD-3 zone.

3. Analysis of Level 1 and 2 conditions found on Liberty's highest wildfire risk circuits.

LU-23B-10 required that if Liberty elected not to adopt a risk-based approach, then Liberty must 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. Because Liberty is implementing an annual drone inspection program of its HFTD-3 zone beginning in 2026, this analysis may not be required, however, because this Revision Notice requires this analysis, refer to Table 1-8, which includes the number of Level 1 and 2 findings, and the date of the most recent detailed inspection for the circuits requested.

Analysis identified that after the detailed inspection of 2020, which included a detailed inspection of Liberty's entire system, there have been approximately 19% fewer Level 1 and 2 conditions recorded in the sum of the years following (2021 through year-to-date 2025). Liberty correlates the decrease in identified conditions with the investments made in the system throughout this same period. This aligns with the improvement seen in these same years regarding the System Average Interruption Duration and Frequency Indexes (SAIDI and SAIFI). Both SAIDI and SAIFI have been steadily improving, including a 36-percent drop in minutes for both indices between 2021 and 2024, when considering the performance of the entire system.

In addition, as depicted in the workbook, 35-percent of the Level 2 conditions were directly related to issues with the poles themselves. Liberty has aggressively executed its pole replacement program. For example, 83-percent of the Level 2 conditions identified are

corrected with a new pole and associated hardware. Once a pole and its associated hardware is replaced, it's much less likely that a Level 1 or 2 condition will return for quite some time. Liberty's pole replacement program is an effective tool for addressing Level 2 conditions and reducing the risk of wildfire ignitions.

Liberty has made significant efforts in maintaining its entire system, which includes the detailed inspection of the entire system. This is demonstrated by the upward trend in reduced identified conditions. In continuation of its efforts, Liberty will be commencing the annual drone inspection program of the HFTD-3 zone. Liberty will also continue to evaluate the effectiveness of inspections and subsequent programs to address identified condition codes.

Liberty has updated its response to LU-23B-10 in Appendix D of its 2026-2028 Base WMP.

Table 1-8: Analysis of Level 1 and 2 Conditions Found on Liberty's Highest Risk Circuits

Overhead Detailed Inspections				5 Most Frequent Condition Codes			
Circuit	**Most Recent Inspection Date**	**Priority Level 1 Assets**	**Priority Level 2 Assets**	**Priority**	**Count**	**Condition Codes**	**Notes**
111	7/25/2024	0	27	Level 2	21 8 1	Guys/Guards Broken/Loose Work Space/Climbing Space Crossarm Needs Replacing	
132	4/1/2022	1	4	Level 1 Level 2	1 1 1 1 1	Hardware Issue Pole Needs Replaced Guys/Guards Broken/Loose Insulators Need Replacing Tree / Vegetation Issue	Pin broken and insulator inverted
608	4/6/2022	0	46	Level 2	21	Pole Cracked Pole Needs Replaced Pole Top Split Crossarm Broken / Loose Crossarm Needs Replacing	
609	12/29/2022	0	16	Level 2	8 7 6 5 5	Guys / Guards Broken / Loose High Voltage Sign Problem Pole Needs Replaced Pole Cracked Pole Stub	
619 (includes LOY619)	2/9/2022	0	1	Level 2	1	Crossarm Broken/Loose	
629	11/23/2022	0	12	Level 2	4 4 3 3 3	Guys / Guards Broken / Loose Insulators Need Replacing Bare Jumpers High Voltage Sign Problem Need Stirrups	
640	9/10/2024	0	13	Level 2	11 1 1 1	Guys/Guards Broken/Loose Conductor Issue Crossarm Braces Falling Off Crossarm Needs Replacing	

Overhead Detailed Inspections				5 Most Frequent Condition Codes			
Circuit	Most Recent Inspection Date	Priority Level 1 Assets	Priority Level 2 Assets	Priority	Count	Condition Codes	Notes
CAL204 (renamed CAL2501)	9/7/2022	0	17	Level 2	11 9 8 7 6	Need Stirrups Pole Top Split Pole Cracked Bare Jumpers Pole Needs Replaced	
CEM41	9/24/2020	0	7	Level 2	3 2 1 1 1	Other Hardware Issue (Describe) Pole Needs Replaced Crossarm Broken / Split / Loose Crossarm Needs Replacing High Voltage Sign Problem	Conductor not properly secured
CEM42	9/24/2020	0	5	Level 2	3 1 1 1	Tree / Vegetation Issue Other Conductor Issue (Describe) Pole Leaning / Unsafe to Climb Pole Needs Replaced	Preform tie coming off center phase
GLS7600	11/9/2024	0	2	Level 2	1 1	Guys/Guards Broken/Loose Insulators Need Replacing	
HOB7700	9/19/2020	0	3	Level 2	2 1 1 1 1	Pole Needs Replaced Other Other Conductor Issue (Describe) Pole Cracked Pole Rot	 East side phase tie wire is loose East side phase tie wire is loose
POR3100	11/11/2024	0	4	Level 2	1 1 1 1	Clearance Crossarm Needs Replacing Guys/Guards Broken/Loose Insulators Need Replacing	
POR3200	11/11/2024	0	58	Level 2	16 10 10 8 5	Guys/Guards Broken/Loose Clearance Crossarm Needs Replacing Ground Molding Damaged/Missing Conductor Issue	
RUS7900	2/27/2025	0	2	Level 2	1 1	Conductor Issue Guys/Guards Broken/Loose	

Overhead Detailed Inspections				5 Most Frequent Condition Codes			
Circuit	Most Recent Inspection Date	Priority Level 1 Assets	Priority Level 2 Assets	Priority	Count	Condition Codes	Notes
SQV8300	9/4/2024	0	11	Level 2	3 3 2 1 1	Clearance Guys/Guards Broken/Loose Insulators Need Replacing Conductor Issue Equipment Anchors	
STL2200	3/21/2025	0	3	Level 2	3 2 1	Crossarm Needs Replacing Insulators Need Replacing Clearance	
STL3101	9/17/2020	0	85	Level 2	36 31 25 24 23	Pole Top Split Bare Jumpers Need Stirrups Grey Wire Pole Cracked	
TAH7200	6/18/2024	0	8	Level 2	4 2 1 1	Guys/Guards Broken/Loose Crossarm Needs Replacing Conductor Issue Insulators Need Replacing	
TRK7202	11/12/2024	0	19	Level 2	10 4 4 2 1	Guys/Guards Broken/Loose Insulators Need Replacing Work Space/Climbing Space Conductor Issue Equipment Anchors	
WSH201	10/31/2025	0	6	Level 2	3 1 1 1 1	Crossarm Needs Replacing Conductor Issue Crossarm Braces Falling Off Guys/Guards Broken/Loose Insulators Need Replacing	

1.7 Critical Issue RN-LU-26-07

Critical Issue Title: Liberty's response to area for continued improvement LU-25U-06 "Additional Inspection Practices," was insufficient.

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.

Remedy Response:

1. How Liberty selected the assets to be inspected during its infrared pilot.

Quanta Aviation is a vendor that specializes in managing, coordinating, and serving electric power aviation operations. Utilizing Quanta Aviation services, Liberty completed 0.1 miles of drone inspections on its transmission assets during the infrared pilot. The criteria for the pilot were qualitative and focused on understanding how a drone can perform the inspection and if the drone can produce results equal to or better than ground-based infrared inspection. The inspections were performed on and around transmission riser poles so that Liberty could identify hot spots on the potheads, arrestors, connections and other associated hardware. Liberty's decision to select these assets for the pilot was guided by subject matter experts who have experience with ground-based infrared inspection with these types of assets. Liberty was able to compare the results of the pilot to assess the reliability of the infrared inspection.

Furthermore, Liberty piloted the use of drones for demand response inspection including 1.4 miles of inspection on the various distribution and sub-transmission circuits, including the Tahoe City 7300, Truckee 7202, and the T609 line. The drone was piloted by Liberty's inspector and focused on the qualitative capability and efficiency of the drone.

Liberty also piloted the use of drones to perform 2.2 miles of detailed inspection on the Washoe 201 circuit. The inspection was performed by Liberty's inspector and focused on the qualitative capability and efficiency of the drone.

2. The success criteria used in Liberty's infrared pilot.

The criteria Liberty used for the infrared pilot was whether the drone was able to successfully and safely perform an infrared inspection in a manner that was equal to or better than a ground-based inspection.

Although the infrared pilot identified zero thermal or visual anomalies during the inspection, the drone was able to successfully and safely inspect the assets from multiple angles, including detection for hot spots.

3. Expansion of the infrared pilot.

Liberty has been cautious to expand its drone infrared inspection program as Liberty wanted to ensure healthy maturation and prudency of drone inspection service capabilities and efficiencies. That said, after performing these pilots and speaking with drone inspection service vendors as well as other utilities performing drone inspections, Liberty plans to add annual drone inspection for all distribution and transmission circuits within its HFTD-3 zone beginning in 2026. Liberty plans to evaluate infrared detection as part of the full-service agreement with the selected vendor.

4. Implementation of infrared inspections as a continuous program.

Liberty plans to add annual drone inspection for all distribution and transmission circuits within its HFTD-3 zone beginning in 2026. Liberty plans to evaluate infrared detection as part of the full-service agreement with the selected vendor.

Liberty has updated its response to LU-25U-06 in Appendix D of its 2026-2028 Base WMP.

1.8 Critical Issue RN-LU-26-08

Critical Issue Title: Liberty's targets for Vegetation Management Inspection Program – Detailed (WMP-VM-INSP-01) were not aligned with the program's scope of work commitment.

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.

Remedy Response:

Liberty has revised its Vegetation Management Inspection Program – Detailed (WMP-VM-INSP-01) targets in Table 9-2 to cover the full scope of its detailed inspection protocol, aligning with its 3-year cycle plan for the entire overhead system.

1.9 Critical Issue RN-LU-26-09

Critical Issue Title: Liberty's pole clearing targets did not adhere to WMP Guidelines.

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.

Remedy Response:

Liberty has updated its pole clearing initiative targets into Pole Clearing-PRC 4292 Required (WMP-VM-VFM-01-R), and Pole Clearing-Discretionary (WMP-VM-VFM-01-D). This change is reflected in Table 9-2. Approximately 4,500 poles require clearing for PRC 4292 and approximately 400 poles in Federal Responsibility Areas (FRA) are cleared as a discretionary measure.

Liberty provides a narrative of its pole clearing activities in a revised version of section 9.4.1 and also explains its scheduling methodology and how risk is considered in its scheduling of pole clearing activities in a revised version of section 9.4.3.

Because most of Liberty's service area falls within Tier 2 and Tier 3 High Fire Threat Districts (HFTD), implementation of its annual pole clearing project is based on seasonal access and fire risk. Work typically occurs between April and July, beginning in lower elevation areas where access is easier and fuels dry earlier in the season. As snowpack recedes, crews transition to higher elevation terrain, including the Tahoe Basin, with Tier 3 HFTD poles receiving top priority.

Quality control is an integral part of the program. Liberty inspects a judgment-based sample of at least 12 percent of all poles cleared each year. Poles identified during inspections as needing additional work are re-cleared as necessary throughout the fire season.

1.10 Critical Issue RN-LU-26-10

Critical Issue Title: Liberty's proposed unit of measurement for its wood and slash management target did not support its scope of work.

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.

Remedy Response:

Liberty has updated Section 9.5 to include a narrative explaining how acres treated are calculated and how the annual target is determined. Historical tree removal and wood management data were analyzed to establish the target, and acres were selected as the unit of measure to align with how other agencies track fuel management work in the service area. Acreage is tracked through completed work orders for wood removal and firewood bucking, as well as partnership projects involving mastication, forest thinning, and other fuel reduction activities. When multiple trees are treated at the same location, acreage is counted only once.

2. Errata Corrections

Liberty made the following errata corrections in its revised 2026-2028 Base WMP to address the errors identified by Energy Safety in Table 1 of its Revision Notice on the Liberty 2026-2028 Base WMP and to correct additional errors identified by Liberty throughout its revision notice process.

Table 2-1: Errata Corrections in Liberty's Revised 2026-2028 Base WMP

Section	WMP Page Number	Correction or Clarification
Overall	-	Liberty distinguished its own tables from the WMP Guidelines-required tables and maintained the table numbers from the WMP Guidelines.
9.1.2 Quantitative Targets	170	Initiative tracking ID for Workforce Planning was created and included in Table 9-1.
9.11 Quality Assurance and Quality Control	200	Updated Table 9-20 to include Compliance Audit. Updated Table 9-21 to include pass rate targets for its Compliance Audit. Updated Section 9.11.4 Pass Rate Calculation to include description of how pass rates for the Compliance Audit are determined.
9.11 Quality Assurance and Quality Control	201	CL/MoE for Detailed Inspections have been added to Table 9-21.
9.11.4 Pass Rate Calculations	203	Tables 9-21, 9-25, 9-26, 9-27, and 9-28 have been updated as requested and provided in DR OEIS-P-WMP_2025_LU-007. Table 9-24 does not require revision and was not provided in DR response either.
9.13.1 Recruitment	211	Table 9-32 has been updated with corrections.
10.1.2	222	Table 10-1 has been updated to remove references to 2025 dates.
10.6.1	246-247	Added required Table 10-5: Fire Potential Features.

11.3.1 Communication Strategy with Public Safety Partners	265	Added required Table 11-3: Liberty Communication Protocols, Procedures, and Systems with Public Safety Partners.
11 Emergency Preparedness, Collaboration, and Public Awareness	287, 290, 292	Corrected References from Appendix G: Liberty's 2025 AFN Plan to Appendix F: Liberty's 2025 AFN Plan.
13.3	307	Added required Table 13-2: Lessons Learned from Discontinued Activities