



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

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VIA OEIS E-FILING

Docket: 2026-2028 Electrical Corporation Wildfire Mitigation Plans
Docket# 2026-2028-Base-WMPs

Tony Marino
Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Subject: Liberty's Substantive Errata for its 2026-2028 Base Wildfire Mitigation Plan (R1)

On December 4, 2025, Liberty submitted its first revised 2026-2028 Base Wildfire Mitigation Plan ("WMP_R1"). Pursuant to Section 7 of the Office of Energy Infrastructure Safety's ("Energy Safety") Process Guidelines, Liberty hereby submits substantive errata for its 2026-2028 Base WMP_R1. Liberty's requested corrections are set forth in the table and redlines on the following pages.

Liberty's 2026-2028 Base WMP is available on Liberty's website at the following link:
[Liberty 2026-2028 Base-WMP R1.pdf](#)

If you have any questions or require any additional information, please contact me at:

Jordan Parrillo
Manager of Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
701 National Ave,
Tahoe Vista, CA 96148
Telephone: 530-721-7818
jordan.parrillo@libertyutilities.com

I. ERRATA CORRECTIONS

The table below lists requested corrections to the December 4, 2025 submission of Liberty's 2026-2028 Base WMP_R1.

Section	Table or Figure (if applicable)	Page Number(s)	Description of Correction	Reason for Correction
6.2.1.1	Figure 6-2	102	Updated Figure 6-2.	Through the discovery process subsequent to Liberty's revised 2026-2028 Base WMP submission, Liberty determined that the accuracy of its long-term risk reduction modeling results shown in Figure 6-2 would be improved and would be better aligned with the intent of Liberty's WMP if it re-ran the simulation while holding inflation at 0% (instead of increasing by 4%), under the assumption that either future GRC proceedings will establish funding levels commensurate with inflation, cost efficiencies commensurate with inflation will be achieved, or a combination of both.
6.2.1.2	Table 6-3	105	Updated errors in Table 6-3.	In its revised 2026-2028 Base WMP submission, Liberty erroneously switched the content of columns three through ten for the Pole Clearing and Patrol Inspections of Distribution Electric Lines and Equipment WMP activities. Additionally, Liberty separated the Vegetation Management – LiDAR and Patrol row into two separate rows as LiDAR and Patrol inspections are two separate WMP activities.

Section	Table or Figure (if applicable)	Page Number(s)	Description of Correction	Reason for Correction
6.2.1.2	Table 6-3	105	Included footnote 35.	Through the discovery process subsequent to Liberty's revised 2026-2028 Base WMP submission, Liberty determined that the content included in footnote 35 would clarify why inspection activities and the Fire-Resilient Right-of-Ways activity have a 0% activity effectiveness for wildfire risk in Table 6-3.
11.2.1		257	Updated information on Emergency Preparedness Memorandum of Understandings (MOUs).	Through the discovery process on its 2026-2028 Base WMP, Liberty identified an erroneous statement and provides additional relevant information.
12.1.1	Table 12-1	294	Added Tracking ID# for Asset Management and Inspection WMP Initiative Activity.	In its revised 2026-2028 Base WMP submission, Liberty inadvertently left out the Tracking ID# for its Asset Management and Inspection WMP Initiative Activity in Table 12-1.
Appendix D: Section 1.4		Appendix D: Section 1.4	Added supplemental information regarding ACI LU-23B-06 and Critical Issue RN-LU-26-04	Through the discovery process subsequent to Liberty's revised 2026-2028 Base WMP submission, Liberty determined that the content added to Appendix D: Section 1.4 would more sufficiently address Energy Safey's intent in Critical Issue RN-LU-26-04.
Appendix D: Section 1.5	Table 1-6	Appendix D: Section 1.5	Updated errors in Table 1-6.	In its revised 2026-2028 Base WMP submission, Liberty erroneously switched the content of columns one and two for three rows in the table.

6.2 Wildfire Mitigation Strategy

Each electrical corporation must provide an overview of its proposed wildfire mitigation strategies based on the evaluation process identified in Section 6.1.³⁴

6.2.1 Anticipated Risk Reduction

In this section, the electrical corporation must present an overview of the expected risk reduction of its wildfire mitigation initiative activities. The electrical corporation must provide:

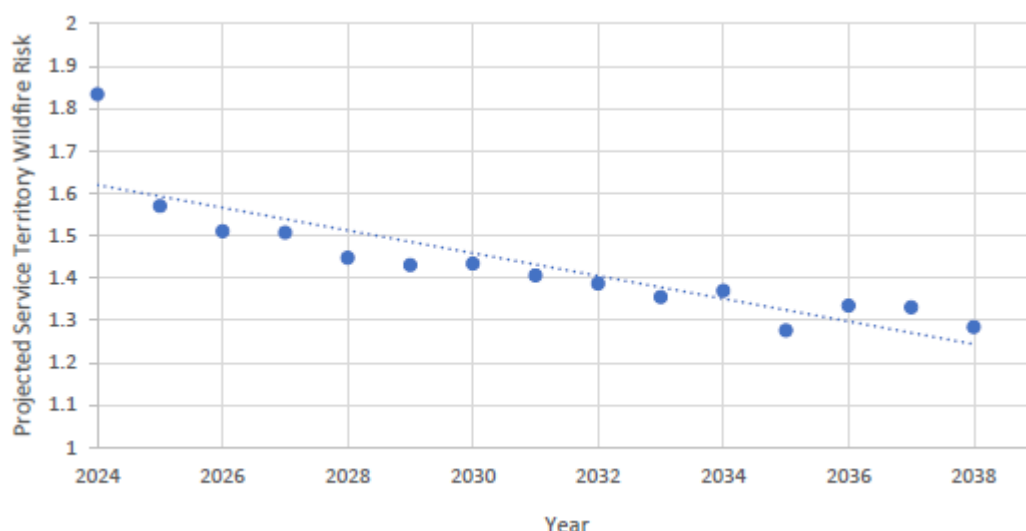
- Projected overall risk reduction
- Projected risk reduction on highest-risk circuits over the three-year WMP cycle

6.2.1.1 Projected Overall Risk Reduction

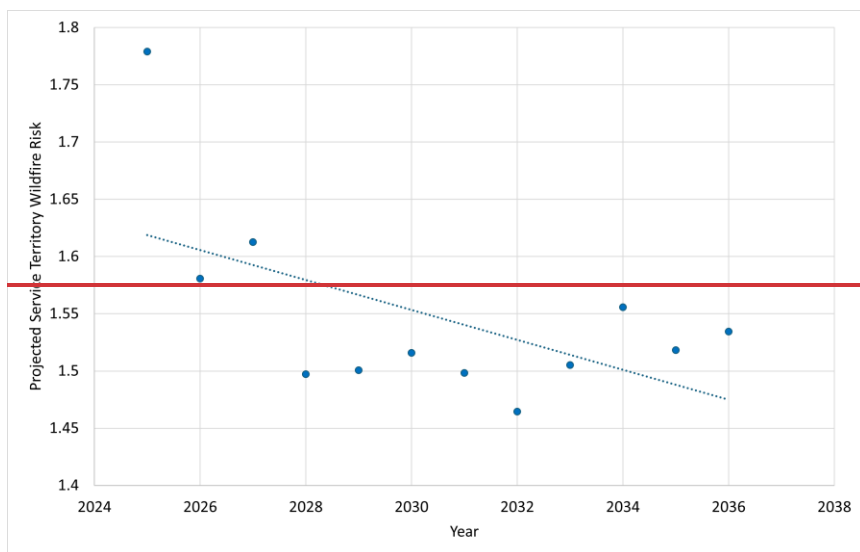
In this section, the electrical corporation must provide a figure showing the projected overall utility risk in its service territory as a function of time, assuming the electrical corporation meets the planned timeline for implementing the initiatives. The figure is expected to cover at least 10 years, consistent with the electrical corporation's submitted ten-year plan. If the electrical corporation proposes risk reduction strategies for a duration longer than ten years, this figure must show that corresponding time frame.

Refer to Figure 6-2.

Figure 6-2: Projected Overall Service Territory Wildfire Risk



³⁴ Pub. Util. Code § 8386(c)(3).



6.2.1.2 Risk Impact of Mitigation Initiatives

The electrical corporation must calculate the overall expected effectiveness for risk reduction of each of its initiative activities. The overall expected effectiveness is the expected percentage for the average amount of risk reduced by the initiative activity. This must be calculated for overall utility risk, being a summation for wildfire risk and outage program risk, as well as wildfire risk and outage program risk respectively.

The electrical corporation must provide the cost benefit score, broken out by overall utility risk, wildfire risk, and outage program risk. The score should be calculated for the activity overall based on overall average initiative effectiveness and average unit costs.

The electrical corporation must calculate the expected % HFRA covered for each of its initiative activity targets over the WMP cycle. The expected % HFRA covered is the percentage of HFRA being worked on by the given initiative from the first year of the Base plan to the last year of the Base plan. This could include the number of circuit miles or the number of assets. For example:

For covered conductor installations, the expected installations from Jan. 1, 2026, through Dec. 31, 2028 = 600 circuit miles

The total number of miles within the HFRA = 4,250 circuit miles

The expected % HFRA covered for the covered conductor installations initiative from 2026 to 2028 is:

$$\frac{\text{units of initiative}}{\text{units within HFRA}} \times 100$$

Table 6-3: Risk Impact Activities

Activity ³⁵	Activity ID#	Activity Effectiveness – Overall Risk	Activity Effectiveness – Wildfire Risk	Activity Effectiveness – Outage Program Risk	Cost-Benefit Score – Overall Risk	Cost-Benefit Score – Wildfire Risk	Cost-Benefit Score – Outage Program Risk	% HFTD Covered	% HFTD/HFRA Covered	Expected % Risk Reduction	Model used to Calculate Risk Impact
Grid monitoring systems	WMP-SA-02	Not Calculated	Not Calculated	Not Calculated	Not Calculated	Not Calculated	Not Calculated	100.0%	100.0%	Not Calculated	DRAT 3.1
Equipment settings to reduce wildfire risk	WMP-GDOM-GO-01	Not Calculated	50.00%	Not Calculated	Not Calculated	125000.00	Not Calculated	100.0%	100.0%	4.67%	DRAT 3.1
Expulsion fuse replacement	WMP-GDOM-GH-12b	Not Calculated	39.67%	Not Calculated	Not Calculated	10083.59	Not Calculated	47.6%	44.4%	8.11%	DRAT 3.1
Distribution pole replacements and reinforcements	WMP-GDOM-GH-03	Not Calculated	95.00%	Not Calculated	Not Calculated	13157.89474	Not Calculated	6.4%	6.0%	14.11%	DRAT 3.1
Open wire/grey wire	WMP-GDOM-GH-12e	Not Calculated	78.72%	Not Calculated	Not Calculated	732879.92	Not Calculated	100.0%	100.0%	0.89%	DRAT 3.1
Vegetation Management Inspection Program - Detailed	WMP-VM-INSP-01	0%	0%	0%	0%	0%	0%	100.0%	100.0%	0%	DRAT 3.1
Undergrounding of electric lines and/or equipment	WMP-GDOM-GH-02	Not Calculated	99.00%	Not Calculated	Not Calculated	Not Calculated	Not Calculated	0.0%	0.0%	0%	DRAT 3.1
Wood and Slash Management	WMP-VM-VFM-02	Not Calculated	50.00%	Not Calculated	48607.64	48607.64	Not Calculated	35.4%	32.9%	2.82%	DRAT 3.1
Quality Assurance and Quality Control	WMP-VM-QAQC-01	Not Calculated	30.59%	Not Calculated	Not Calculated	6902.62	Not Calculated	36.0%	36.0%	Non-significant	DRAT 3.1
Covered conductor installation	WMP-GDOM-GH-01	Not Calculated	50.00%	Not Calculated	Not Calculated	4139456.83	Not Calculated	1.7%	1.6%	2.00%	DRAT 3.1
Clearance	WMP-VM-VFM-05	Not Calculated	50.00%	Not Calculated	Not Calculated	14.92	Not Calculated	100.0%	100.0%	1.91%	DRAT 3.1
Fall-In Mitigation	WMP-VM-VFM-06	Not Calculated	50.00%	Not Calculated	Not Calculated	3505.35	Not Calculated	100.0%	100.0%	2.63%	DRAT 3.1
Detailed inspections of distribution electric lines and equipment	WMP-GDOM-AI-01	0%	0%	0%	0%	0%	0%	63.7%	60.5%	0%	DRAT 3.1
Tree attachment removals	WMP-GDOM-GH-12a	Not Calculated	78.72%	Not Calculated	Not Calculated	24303.82	Not Calculated	9.9%	9.4%	2.00%	DRAT 3.1
Vegetation Inspection - LiDAR and Patrol	WMP-VM-INSP-03 and WMP-VM-INSP-02	0%	0%	0%	0%	0%	0%	100.0%	100.0%	0%	DRAT 3.1
<u>Vegetation Management - LiDAR</u>	<u>WMP-VM-INSP-03</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>	<u>100.0%</u>	<u>100.0%</u>	<u>0%</u>	<u>DRAT 3.1</u>
Pole Clearing	WMP-VM-VFM-01	Not Calculated 0%	40.50% 0%	Not Calculated 0%	Not Calculated 0%	239.230%	Not Calculated 0%	100.0% 100.0%	100.0% 100.0%	Non-significant 0%	DRAT 3.1
Patrol inspections of distribution electric lines and equipment	WMP-GDOM-AI-03	0% Not Calculated	0% 40.50%	0% Not Calculated	0% Not Calculated	0% 239.23	0% Not Calculated	100.0% 100.0%	100.0% 100.0%	0% Non-significant	DRAT 3.1
Fire-Resilient Right-of-Ways	WMP-VM-VFM-04	0%	0%	0%	0%	0%	0%	100.0%	100.0%	0%	DRAT 3.1
Intrusive pole inspections	WMP-GDOM-AI-02	0%	0%	0%	0%	0%	0%	37.5%	37.1%	0%	DRAT 3.1
Other discretionary asset inspections: Drone inspections	WMP-GDOM-AI-04	0%	0%	0%	0%	0%	0%	7.4%	6.9%	0%	DRAT 3.1

³⁵ Inspection activities have a 0% activity effectiveness for wildfire risk because those activities do not lead to direct risk reduction but instead lead to activities that will reduce risk. The Fire-Resilient Right-of-Ways activity has a 0% activity effectiveness for wildfire risk because Liberty's target is 0 for that activity in the 2026-2028 WMP cycle.

activate the IMT for predicted storms including winter weather and atmospheric river events as well.

Liberty activates its PSPS IMT when conditions are projected to meet Liberty's thresholds for de-energization based on Composite Risk Index described in Section 10.6. PSPS IMT actions are outlined in the Liberty PSPS Playbook, which prescribes PSPS IMT baseline positions and checklist items for each position to accomplish during each phase of the response. A dedicated PSPS Playbook and IMT support consistent decision-making, deeper PSPS-specific experience, and greater ability to support continuous improvements during non-event periods. The PSPS Playbook includes pre-scripted messaging for each stage of a PSPS. It also prescribes separate liaisons for regulatory affairs, public safety partners ("PSPs"), community-based organizations ("CBOs"), and AFN customers.

Initial Qualifications: IMT members are required to complete ICS training through the company Learning Management System ("LMS"). This training was developed from and includes the principles from the FEMA Emergency Management Institute (EMI) IS 100.c and IS 200.c courses. In addition, the Emergency Manager, Fire Prevention Managers, and Incident Commander are required to have completed the IS 100.c, IS 200.c, IS 700.b and IS 800.d courses

Requalification: Training on ICS principals is assigned and tracked through the LMS system and is required to be completed yearly along with the practical application of training in both tabletop and functional exercises. Training has been conducted for customer service supervisors and staff with responsibilities for working in customer resource centers ("CRCs") in the event of a PSPS. CRC staff training is provided and required each year prior to fire season.

Additional information on Emergency Preparedness personnel training is detailed in LU Table 11-1: Emergency Management Personnel Training.

Emergency Preparedness and Service Restoration MOUs:

~~Liberty does not have any MOUs with agencies relates to emergency preparedness, response, and recovery activities.~~ Liberty has MOUs with the following agencies to establish CRCs in the event of a PSPS: Washoe Tribe of Nevada and California, Incorporated Senior Citizens of Sierra County, Tahoe City Public Utility District, Plumas County, Mono County, Lake Tahoe Unified School District, and Truckee Tahoe Airport. In executing other response & recovery activities, Liberty utilizes in-house staff, contractors, and mutual aid if needed. ~~Liberty has MOUs with its CRC locations in the event of a PSPS, however i~~ In the event of an active fire, Red Cross and the county governments in Liberty's service territory would be responsible for activating and manning evacuation centers.

database, and used in reporting. Currently, this process is carried out manually through inspection of dashboards, lengthy review of source data, and coordination between multiple team members and data collectors in the field. Automatic DQM Reporting on Liberty's SQL database will be in place by the end of 2028.

Asset Management Inspection Application Reduction: Liberty will implement a single, multi-year asset inspection and management application. Liberty will finish data migration from previous single-year apps into the new application, "Asset Tracking". Historical inspection apps will be archived, creating a single data source for Liberty's future gathering of asset inspection and maintenance data. Currently, Liberty has asset inspection and maintenance data stored in six collection apps. Five of these applications are based on inspection type and year for inspections starting in 2020. In 2024 Liberty began rolling out the "Asset Tracking" Fulcrum application. This application will serve as a multi-year asset inspection and management application. By the end of 2028 all asset inspection and management data will be stored in the Asset Tracking application and previous Fulcrum applications will be archived.

Table 12-1: Enterprise System Targets

WMP Initiative	Activity (Tracking ID#)	2026 End-of-Year Total / Completion Date	2027 Total / Status	2028 Total / Status	Section; Page Number
Enterprise System – Vegetation Management	Vegetation Data Quality Management (WMP-VM- ESG-01)	Started: March 2026	In Progress	Completed: December 31, 2028	12.1.1; pp. 293-294
Enterprise System – Asset Management and Inspection	Asset Management Inspection Application Reduction (WMP- GDOM-GO- 05A/A)	Started: March 2026	In Progress	Completed: December 31, 2028	12.1.1; pp. 293-294

12.2 Summary of Enterprise Systems

Electrical corporations must provide a summary narrative of no more than three pages that discusses how its enterprise systems contain, account, or allow for the following:

- Any database(s) the electrical corporation used for data storage.

Supplemental information, per Energy Safety Data Request OEIS-P-WMP 2025-Liberty-012:

In its initial simulation, Liberty compared traditional overhead hardening, covered conductor, and underground conductor in combination with SRP to calculate the difference in risk reduction between those mitigation activities. Liberty had data to support the undergrounding for the Tahoe Vista Rule 20 and the Stateline Resiliency projects at the time of running the scenarios. Therefore, the analysis focused on those two projects.

Liberty has since updated the analysis to include the risk reduction of traditional overhead hardening and covered conductor in combination with SRP at the service territory per the intent of LU-23B-06 ACI. These calculations below are based on the targets set forth in Liberty's 2026-2028 Base WMP.

<u>Mitigation Activity</u>	<u>Wildfire Risk Reduction</u>
<u>Sensitive Relay Profile</u>	<u>4.67%</u>
<u>Covered Conductor</u>	<u>2.00%</u>
<u>Covered Conductor + SRP</u>	<u>10.39%</u>
<u>Traditional Overhead Hardening</u>	<u>17.22%</u>
<u>Traditional Overhead Hardening + SRP</u>	<u>24.72%</u>

1.5 LU-25U-04: Cost-Benefit Analysis for the Stateline Resiliency Project

Description: Liberty's updated target, projected expenditure, and project changes to its undergrounding initiative in 2025 raise concerns about the cost-benefit ratio of undergrounding in its service territory.

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

- Discuss its undergrounding cost-benefit analysis evaluation and decision-making process, including consideration of feasibility and resource use efficiency, and its plan to improve on this process based on lessons learned. This discussion must include lessons learned from the Tahoe Vista project.
- Provide cost-benefit analysis and cost-benefit ratios for hardening the Stateline Resiliency Project through undergrounding, covered conductor, SRP, covered conductor in combination with SRP, and traditional hardening in combination with SRP. This analysis must consider the risk drivers present on the affected circuits, the effectiveness of each mitigation at addressing the present risk drivers, the estimated capital cost of

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 1-6 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:

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

Table 1-6: 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 No replacement with SRP	0.021320 0.14306	\$300,000.00	0.07106
No Replacement With SRP Underground Conductor With SRP	0.290770 0.02132	\$4,500,000.00	0.06462
Underground Conductor With SRP Covered Conductor Without SRP	0.143060 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