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December 31, 2025

**DATA REQUEST RESPONSE
LIBERTY UTILITIES (LIBERTY)**

Data Request No.: OEIS-P-WMP_2025-Liberty-013

Requesting Party: Office of Energy Infrastructure Safety

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Date Received: December 26, 2025

Due Date: December 31, 2025

Subject:

Q01. Regarding Expulsion Fuse Replacements
Q02. Regarding Implementation of the Sensitive Relay Profile Program
Q03. Regarding Documentation from Liberty's Internal Risk Focus Group
Q04. Regarding Liberty's Fire Prevention Plan

Q01. Regarding Expulsion Fuse Replacements:

On pg. 132 of its 2026-2028 base WMP R1 Clean, Liberty provides details on the expulsion fuse replacements initiative. Liberty states that, “Liberty has established a long-term goal of eliminating all expulsion fuses from its electric system.”

- a. Provide the number of expulsion fuses that remain on Liberty’s system.
- b. Explain how Liberty plans and executes the elimination of expulsion fuses (e.g., expulsion fuses are replaced as part of bundled maintenance and/or other wildfire mitigation work, expulsion fuses are replaced as an independent mitigation activity).

Q01 Response:

- A. Liberty estimates that approximately 3,000 expulsion fuses remain in the system.
- B. Liberty plans and executes the elimination of expulsion fuses in bundled work as well as an independent mitigation activity. Expulsion fuses are replaced as part of other maintenance and wildfire mitigation work, for example: transformer replacements, and distribution pole reinforcements and replacements. Liberty also locates and replaces expulsion fuses as an independent mitigation activity.

Q02. Regarding Implementation of the Sensitive Relay Profile Program:

On pg. 109 of its 2026-2028 base WMP R1 Clean, Liberty states, “Liberty’s primary interim mitigation is the implementation of the Sensitive Relay Profile program throughout its system which will be complete by the end of 2025.”

- a. Has Liberty completed implementation of the Sensitive Relay Profile program?
 - i. If not, describe what setbacks and roadblocks prevented this implementation from occurring on the stated timeline.
 - ii. If not, provide a new timeline with milestones for completion of the implementation of the Sensitive Relay Profile program.

Q02 Response:

- a. Yes, Liberty has completed implementation of the Sensitive Relay Profile program.

Q03. Regarding Documentation from Liberty's Internal Risk Focus Group:

In its response to Critical Issue RN-LU-26-02 in the Revision Notice Response, Liberty provides a description of Liberty's Internal Risk Focus Group. In this description, Liberty lists several reports and whitepapers.

- a. Provide the following reports and whitepapers:
 - i. Dynamic Grid Management Technologies Reduce Wildfire Adaptation Costs in the Electric Power Sector
 - ii. EPSS Effectiveness Metric Enhancement
 - iii. Direxyon Wildfire Risk calculation – Liberty
 - iv. Presentation of Phase3 and WMP Support results

Q03 Response:

- a. Refer to the following attachments:
 - i. "DR014 Attachment 1- Energy Institute WP 347R_March 2025"
 - ii. "DR014 Attachment 2 - EPSS Effectiveness Metric Enhancement Whitepaper"
 - iii. "DR014 Attachment 3 - Direxyon Wildfire Risk calculation – Liberty"
 - iv. "DR014 Attachment 4 - Presentation of Phase 3 and WMP Support results"

Q04. Regarding Liberty's Fire Prevention Plan:

In Table 9-14, page 200 of Liberty's 2026-2028 Base WMP R1 Clean, Liberty cites its Fire Prevention Plan v1, effective 10/9/2020.

- a. Is v1 of Liberty's Fire Prevention Plan the most current version?
 - i. If not, provide Liberty's most current Fire Prevention Plan.

Q04 Response:

- a. Yes.