



February 18, 2026

**Subject: Office of Energy Infrastructure Safety's Draft Decision on Liberty Utilities (CalPeco), LLC's 2026-2028 Base Wildfire Mitigation Plan**

Dear Wildfire Mitigation Plan Stakeholders:

Enclosed is the Office of Energy Infrastructure Safety's Draft Decision on Liberty Utilities (CalPeco), LLC's (Liberty) 2026-2028 Base Wildfire Mitigation Plan.

This Draft Decision is published for public review and comment. Opening comments must be submitted no later than March 9, 2026. Reply comments must be submitted no later than March 19, 2026.

Comments must be submitted to Energy Safety's e-filing system in the 2026-2028 Wildfire Mitigation Plans docket (#2026-2028-Base-WMPs).<sup>1</sup> Energy Safety's Policy Division Process Guidelines provides more information on submitting opening and reply comments.<sup>2</sup>

Sincerely,

/s/ Tony Marino

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

---

<sup>1</sup> Submit comments via the [2026-2028-Base-WMPs](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs) docket on Energy Safety's e-filing system, (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs>).

<sup>2</sup> [Energy Safety Policy Division Process Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58025&shareable=true), pages 2-3, published February 24, 2025, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58025&shareable=true>).



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**  
**DRAFT DECISION**  
**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC**  
**2026-2028 BASE WILDFIRE MITIGATION PLAN**

February 18, 2026

# 1. Executive Summary

The Liberty Utilities (CalPeco Electric) LLC (Liberty) 2026-2028 Base Wildfire Mitigation Plan (WMP) is denied.

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations construct, maintain, and operate electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment. Pursuant to Public Utilities Code section 8386.3(a), this Decision serves as Energy Safety's assessment and denial of the Liberty 2026-2028 Base WMP R1, dated December 4, 2025, which is inclusive of all changes resulting from all Revision Notices and previously submitted errata. The Energy Safety Decision incorporates comments from members of the public.

Following the failure of Liberty's 2026-2028 Base WMP initial submission to meet statutory guideline requirements, Energy Safety issued a Revision Notice identifying 10 critical issues and provided Liberty with the required remedies to address these issues. Liberty's Revision Notice Response and subsequent substantive errata did not satisfactorily address five of the 10 identified critical issues.

The remaining five critical issues stem from fundamental problems with Liberty's risk model. Without a model that produces valid risk outputs, Liberty cannot demonstrate that it can effectively choose risk mitigations and apply them in the areas of its service territory that need mitigation most. Energy Safety has raised concerns with Liberty's risk model in its Decisions since 2023, yet Liberty has not made reasonable progress toward continuing improvement.

Liberty must improve its risk model, address outstanding critical issues, and submit a new WMP between August and November 2026. In the interim, Liberty must continue to mitigate and reduce its wildfire risk and maintain public safety. Energy Safety will continue to monitor Liberty's performance through regular progress reports, inspections, and audits.

# TABLE OF CONTENTS

1. Executive Summary .....	i
TABLE OF CONTENTS.....	ii
2. Introduction .....	1
2.1 2026-2028 Base WMP Submission and Publication Summary .....	1
2.2 Consultation with California Department of Forestry and Fire Protection .....	1
2.3 Public Comment.....	2
3. Revision Notice Critical Issues .....	3
3.1 Discussion .....	4
3.2 Unsatisfactory Responses to Critical Issues.....	5
4. Conclusion.....	16
4.1 Discussion .....	16
4.2 Liberty's Wildfire Mitigation Work in 2026.....	16
4.3 Next Steps.....	16

## LIST OF APPENDICES

Appendix A References Table .....	A-2
Appendix B Public Comments.....	A-4

## 2. Introduction

Energy Safety denies the Liberty 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP) R1, which includes revisions resulting from all Revision Notices and previously submitted errata.<sup>1</sup>

Liberty submitted its 2026-2028 Base WMP R0 on June 27, 2025. This Base WMP covers a three-year period from 2026 through the end of 2028 (the WMP cycle).

### 2.1 2026-2028 Base WMP Submission and Publication Summary

This section provides a list of the 2026-2028 Base WMP submissions and publications by Liberty and Energy Safety. Information regarding the submission types can be found in the Energy Safety WMP Guidelines.

- 05/30/2025 - Liberty submitted its 2026-2028 Base WMP Pre-Submission
- 06/13/2025 - Energy Safety issued the Pre-Submission Check Sufficiency Determination for the Liberty 2026-2028 Base WMP Pre-Submission
- 06/27/2025 - Liberty submitted its 2026-2028 Base WMP R0
- 07/01/2025 - Liberty submitted its 2026 Maturity Survey responses
- 10/21/2025 - Energy Safety issued a Revision Notice on Liberty's 2026-2028 Base WMP R0
- 12/04/2025 - Liberty submitted its Revision Notice Response
- 12/04/2025 - Liberty submitted its revised 2026-2028 Base WMP R1
- 12/18/2025 - Liberty submitted substantive errata for its 2026-2028 Base WMP R1

### 2.2 Consultation with California Department of Forestry and Fire Protection

The Office of the State Fire Marshal is part of the California Department of Forestry and Fire Protection (CAL FIRE). Public Utilities Code section 8386.3(a) requires Energy Safety to consult with the Office of the State Fire Marshal in reviewing electrical corporation WMPs. The Office of the State Fire Marshal provided meaningful consultation and input on the evaluation, but this Decision is solely an action of Energy Safety and not the Office of the State Fire Marshal or CAL FIRE.

---

<sup>1</sup> WMP Guidelines, page 9.

## 2.3 Public Comment

In rendering its decision, Energy Safety considered comments on the Liberty 2026-2028 Base WMP submitted pursuant to Public Utilities Code section 8386.3(d).

### 2.3.1 Comments on the Liberty 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the Liberty 2026-2028 Base WMP. The following individuals and organizations submitted comments:

- Green Power Institute
- TAHOE SPARK

Energy Safety considered all comments prior to issuing this Decision. Appendix B contains a summary of the comments Energy Safety concurred with and incorporated into this Decision.

### 2.3.2 Comments on the Liberty Revision Notice Response and Revised 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the Liberty Revision Notice Response and revised 2026-2028 Base WMP.

No members of the public provided comments on the Liberty Revision Notice Response and Revised 2026-2028 Base WMP.

## 3. Revision Notice Critical Issues

The following critical issues were identified in Energy Safety's Revision Notice on Liberty's 2026-2028 Base WMP R0.<sup>2</sup> Section 3.2, Unsatisfactory Responses to Critical Issues, provides detailed evaluations of the critical issues that were not satisfactorily remedied in Liberty's Revision Notice Response and 2026-2028 Base WMP R1.

### Risk Methodology and Assessment

- **RN-LU-26-01:** Liberty's risk modeling framework and calculations overemphasized Public Safety Power Shutoff (PSPS) and outage risk.
  - Not satisfactorily addressed, see Section 3.2.1
- **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.
  - Not satisfactorily addressed, see Section 3.2.2
- **RN-LU-26-03:** Liberty's risk reduction assessment lacked maturity and did not accurately assess mitigation activities' effectiveness.
  - Not satisfactorily addressed, see Section 3.2.3

### 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.
  - Not satisfactorily addressed, see Section 3.2.4
- **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.
  - Not satisfactorily addressed, see Section 3.2.5
- **RN-LU-26-06:** Liberty's response to area for continue improvement LU-23B-10 "Distribution Detailed Inspection Frequency," was insufficient.
  - Satisfactorily addressed
- **RN-LU-26-07:** Liberty's response to area for continued improvement LU-25U-06 "Additional Inspection Practices," was insufficient.
  - Satisfactorily addressed

---

<sup>2</sup> Revision Notice, page 2.

## 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.
  - Satisfactorily addressed
- **RN-LU-26-09:** Liberty’s pole clearing targets did not adhere to WMP Guidelines.
  - Satisfactorily addressed
- **RN-LU-26-10:** Liberty’s proposed unit of measurement for its wood and slash management target did not support its scope of work.
  - Satisfactorily addressed

## 3.1 Discussion

On October 21, 2025, Energy Safety issued a Revision Notice on Liberty’s 2026-2028 Base WMP R0 in which Energy Safety identified 10 critical issues and provided detailed required remedies.<sup>3</sup> Liberty submitted its Revision Notice Response on December 4, 2025.<sup>4</sup> Energy Safety finds the Revision Notice Response and substantive errata did not satisfactorily address the remedies for five of the 10 critical issues.<sup>5</sup>

In totality, Liberty’s WMP failed to demonstrate that it can identify and mitigate risk effectively across its system. For example, Liberty concluded that “normal replacement” (bare wire) has higher ignition risk reduction than “covered conductor” installation even though other electrical corporations’ effectiveness calculations have consistently demonstrated otherwise. Despite requests from Energy Safety since 2023, Liberty still could not provide calculations to support such a conclusion.

Liberty’s risk assessment and modeling are underdeveloped, as evidenced by the unsatisfied critical issues. Liberty lacks required analysis, has inconsistent calculations, takes an unsupported interpretation of model outputs, and doesn’t provide a detailed or specific risk assessment improvement plan. Therefore, Liberty’s risk assessment and modeling require significant improvement to demonstrate effective, resource-efficient decision-making of where and how it is planning and selecting mitigation activities.

Additionally, Energy Safety’s Revision Notice noted Liberty’s repeated and sustained failure to fully respond to previous areas for continued improvement.<sup>6</sup> The WMP Guidelines state

---

<sup>3</sup> Revision Notice.

<sup>4</sup> Revision Notice Response.

<sup>5</sup> WMP Guidelines, page 9.

<sup>6</sup> Revision Notice, page 27.

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.”<sup>7</sup> In its 2026-2028 Base WMP R0 submission, Liberty failed to sufficiently respond to five areas for continued improvement identified in previous Energy Safety Decisions. In the Revision Notice, Energy Safety required Liberty to address the insufficient responses, but Liberty still did not satisfactorily remedy two of the critical issues for insufficient areas for continued improvement responses.<sup>8</sup>

Energy Safety provides more details about the critical issues, the required remedies, and Liberty’s responses in Section 3.2 below.

## 3.2 Unsatisfactory Responses to Critical Issues

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

Energy Safety’s Revision Notice on Liberty’s 2026-2028 Base WMP R0, stated that Liberty “did not develop a risk reduction framework that is consistent with its peers and that reflects a reasonable weighting of outage program and wildfire risk.”<sup>9</sup> Liberty’s risk modeling outputs showed outage program risk to be larger than wildfire risk by multiple orders of magnitude leading to a small number of circuits reflecting the bulk of the system’s risk.<sup>10</sup>

In the Revision Notice, Energy Safety required Liberty to revise its 2026-2028 Base WMP to include a detailed plan addressing adjustments to wildfire and outage program risk scoring methodology to resolve shortcomings for implementation in Liberty’s next WMP Update.<sup>11</sup> Additionally, Energy Safety required Liberty to recalculate all risk score calculations and rankings using only wildfire risk throughout its 2026-2028 Base WMP and to make any downstream adjustments to mitigation activities based on the new calculations.<sup>12</sup>

---

<sup>7</sup> WMP Guidelines, page 11.

<sup>8</sup> Revision Notice, pages 10-12.

<sup>9</sup> Revision Notice, page 5.

<sup>10</sup> Revision Notice, pages 3-5.

<sup>11</sup> Revision Notice, page 5.

<sup>12</sup> Revision Notice, page 6.

### **3.2.1.1 RN-LU-26-01: Energy Safety Evaluation of Liberty's Response**

Liberty did not provide a detailed plan to conduct new risk score calculations and did not address the impacts any new calculations may have on the mitigation activity targets as required by the Revision Notice, as discussed below.

#### **Required Remedy: Adjust Wildfire and Outage Program Risk Scoring Methodology Plan**

Liberty's Revision Notice Response and revised 2026-2028 Base WMP R1 provided a high-level plan to test and assess its risk calculations and model beginning in 2026; however, this plan lacked the required details such as a granular implementation timeline and well-defined milestones to implement changes to address the shortcomings in Liberty's risk calculations.<sup>13</sup>

As noted in the Revision Notice, the “[c]oncentration of risk scores on a limited and small number of circuits ... may result in a loss of understanding of actual risks throughout Liberty's territory,” and this may create “cascading impacts to mitigation activity selection and resource allocation.”<sup>14</sup> The lack of a granular timeline and milestones committing Liberty to correct its risk calculations can perpetuate misalignment of mitigation activity selection and use of resources in Liberty's service territory where wildfire risks are the greatest.

Without the details specified in the Revision Notice required remedies, Liberty's response is unsatisfactory. Energy Safety remains concerned that Liberty does not accurately select mitigation activities based on risk model outputs.

#### **Required Remedy: Recalculate Risk Scores and Adjust Targets**

In its Revision Notice Response and revised 2026-2028 Base WMP R1, Liberty recalculated its risk scores using only wildfire risk and omitting outage program risk, resulting in a substantial shift in circuit risk ranking. However, Liberty did not update its mitigation activity targets for 2026, and stated it “will adjust mitigation activities as needed in its 2027 and 2028 WMP Updates.”<sup>15</sup> In a data request, Energy Safety requested confirmation that Liberty did not intend to update any mitigation activity targets in its 2026-2028 Base WMP.<sup>16</sup> In its data request response, Liberty confirmed it did not make changes to its mitigation activities for any year of the WMP cycle.<sup>17</sup>

---

<sup>13</sup> Revision Notice Response, page 12.

<sup>14</sup> Revision Notice, page 5.

<sup>15</sup> Revision Notice Response, page 5.

<sup>16</sup> DR-012 Response, question 3.

<sup>17</sup> DR-012 Response, question 3.

A recalculation of risk scores can change where mitigation activities should be prioritized and may result in an update to mitigation activity targets to address the shift in circuit risk ranking. Therefore, at a minimum, Liberty should have provided an explanation of how the new calculations did not impact mitigation activity targets. The lack of a satisfactory explanation for any changes to mitigation activity target selection after a recalculation not only detracts from mitigation activity effectiveness and resource efficiency but demonstrates that Liberty is failing to show a clear action plan to continue to reduce wildfire risks.

Because the mitigation activity targets were not updated and Liberty did not provide an explanation supporting its decision to not update the targets, Liberty's response is unsatisfactory. Energy Safety remains concerned that Liberty cannot select or prioritize mitigation activities that accurately reflect its risk scores.

### **3.2.2 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.**

Energy Safety's Revision Notice on Liberty's 2026-2028 Base WMP R0, stated that Liberty's "risk model validation reporting did not adhere to the WMP Guidelines requirements for a risk assessment improvement plan."<sup>18</sup> Liberty's risk assessment improvement plan did not include enough information on how Liberty performs risk model validation and tracking, and was missing timelines and key milestones.<sup>19</sup> Additionally, Liberty stated it maintained an internal Risk Focus Group that reviews data and model output as part of its validation process, but it did not include explanations of the group's process.<sup>20</sup>

In the Revision Notice, Energy Safety required Liberty to provide documentation from Liberty's internal Risk Focus Group and a detailed risk assessment improvement plan.<sup>21</sup> Energy Safety required the improvement plan to include milestones and timelines that clearly describe how Liberty intends to evaluate and validate its current risk model methodologies and outputs as well as further details regarding validation and accuracy evaluations.<sup>22</sup> The Revision Notice further stated that without such information, it was "difficult to determine if

---

<sup>18</sup> Revision Notice, page 6.

<sup>19</sup> Revision Notice, page 6.

<sup>20</sup> Revision Notice, page 6.

<sup>21</sup> Revision Notice, page 7.

<sup>22</sup> Revision Notice, page 7.

Liberty’s risk model results provided accurate representations of risk” and “if Liberty is fully aware of its deficiencies through its risk model.”<sup>23</sup>

### **3.2.2.1 RN-LU-26-02: Energy Safety Evaluation of Liberty’s Response**

Liberty did not provide all the required elements regarding the Risk Focus Group or the risk assessment improvement plan required by the Revision Notice, as discussed below.

#### **Required Remedy: Provide Documentation from Risk Focus Group**

In its Revision Notice Response and revised 2026-2028 Base WMP R1, Liberty provided minimal information about its internal Risk Focus Group, with documentation remaining primarily high-level and lacking detail. Liberty only provided a one-page description of a “cross-functional” feedback process, with no supporting reports or findings.<sup>24</sup> Liberty also provided little additional documentation on its risk model supporting its risk model improvements and updates. The only supporting documentation Liberty provided for the changes made to the risk model was a three-page attachment from Liberty’s third-party vendor with the disclaimer, “The current weighting structure is preliminary and should be confirmed and validated by Liberty to ensure it reflects their priority and risk-tolerance framework.”<sup>25</sup>

Liberty did not include any supporting narrative or evidence to demonstrate that it performed a validation of the third-party generated risk modeling products by its internal Risk Focus Group or any other entity within Liberty’s organization. As stated in the Revision Notice, “[w]ithout proper risk model validation reporting, it is difficult to determine if Liberty’s risk model results provided accurate representations of risk.”<sup>26</sup> In effect, Liberty’s risk model outputs are unreliable to inform mitigation strategy to reduce the risk for catastrophic wildfire in its service territory.

Because Liberty did not include reports from its internal Risk Focus Group that addressed modeling criteria or analysis of the third-party model results, Liberty’s response is unsatisfactory. Energy Safety remains concerned that Liberty does not fully understand its risk modeling and lacks validation of the model’s outputs.

#### **Required Remedy: Provide a Risk Assessment Improvement Plan**

Liberty’s Revision Notice Response and revised 2026-2028 Base WMP R1 only provided high-level goals and start dates for its risk assessment improvement plan and did not include completion dates or key milestones as required by the Revision Notice. Liberty’s risk

---

<sup>23</sup> Revision Notice, page 6.

<sup>24</sup> Revision Notice Response, pages 9-11.

<sup>25</sup> Liberty’s 2026-2028 Base WMP R1, Attachment B2, pages 493-496.

<sup>26</sup> Revision Notice, page 7.

assessment improvement plan is incomplete. Liberty cannot define or track success, make necessary adjustments, or properly evaluate its effectiveness for assessing risk on its system because it failed to identify completion dates and key milestones. Further, Liberty cannot meet Energy Safety's requirements for demonstrating an ability to mature and advance its risk assessments without the required completion dates and milestones.

For those reasons, Liberty's response is unsatisfactory and Energy Safety remains concerned about Liberty's ability to adjust its risk assessments to accurately inform decision-making for mitigation activities.

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

In its 2026-2028 Base WMP R0, Liberty did not follow Energy Safety's WMP Guidelines requirements for risk reduction assessment.<sup>27</sup> Specifically, “[b]ecause Liberty's risk reduction assessment did not include the correct expected percentage risk reduction calculation, it did not accurately assess mitigation activities' effectiveness.”<sup>28</sup> These miscalculations created cascading impacts to mitigation effectiveness and risk reduction misrepresentation throughout the R0 submission.<sup>29</sup>

In the Revision Notice, Energy Safety required Liberty to recalculate risk reduction values using only wildfire risk and excluding outage program risk, provide its evaluation of the number of risk model scenarios and validation necessary for more accurate representations of mitigation activity effectiveness values, and update figures and tables with the updated values for risk reduction or mitigation effectiveness based on running additional scenarios.<sup>30</sup>

#### **3.2.3.1    RN-LU-26-03: Energy Safety Evaluation of Liberty's Response**

Liberty did not provide a satisfactory response to all required remedies regarding its risk reduction and effectiveness values as required by the Revision Notice, and did not adequately demonstrate that it accurately evaluated its mitigation activities' effectiveness, as discussed below.

---

<sup>27</sup> Revision Notice, page 8.

<sup>28</sup> Revision Notice Response, page 8.

<sup>29</sup> Revision Notice Response, page 9.

<sup>30</sup> Revision Notice Response, page 9.

## Required Remedy: Recalculate Risk Reduction Values

Liberty provided a recalculation of risk reduction values in its Revision Notice Response and revised 2026-2028 Base WMP R1.<sup>31</sup> However, the recalculated effectiveness values for risk reduction of some mitigation activities listed in *Table 6-3, Risk Impact Activities*<sup>32</sup> are unreasonably high as compared to other electrical corporations in California, and Liberty did not provide satisfactory explanations or discussions about the high effectiveness values.<sup>33</sup> For example, Liberty lists the effectiveness for reducing wildfire risk of its patrol inspections of equipment as 40.5 percent in Table 6-3, whereas Pacific Gas & Electric (PG&E) and San Diego Gas & Electric (SDG&E) list the effectiveness for reducing wildfire risk of their patrol inspections of equipment as 6 percent and 10 percent respectively.<sup>34</sup>

The risk reduction values Liberty provided for individual mitigations did not sum to the total year to year change as seen in *Figure 6-2, Projected Overall Service Territory Wildfire Risk* indicating Liberty inaccurately or inconsistently calculated its risk reduction values.<sup>35</sup> Many of the effectiveness values listed were at 50 percent, which likely indicates the effectiveness values weren't calculated with mitigation-specific risk reduction data as it is statistically improbable multiple mitigations would have the exact same round percent.

Additionally, the use of the two significant figures of 50 percent appears to indicate a false precision, calling into question Liberty's understanding of fundamental mathematical principles. Further, Liberty did not provide supporting analysis that would explain the potentially inaccurate or inconsistent risk reduction and effectiveness values. Without accurate risk reduction values, Liberty cannot quantitatively support that its planned mitigation activities are effectively reducing wildfire risk over time and maximizing the amount of risk reduced on its system.<sup>36</sup>

Liberty's response is unsatisfactory and Energy Safety remains concerned regarding the accuracy of Liberty's risk reduction percentages and effectiveness values, and the lack of explanatory documentation on calculation methodology.

---

<sup>31</sup> Revision Notice Response, pages 15-17.

<sup>32</sup> Liberty's Errata, PDF page 6.

<sup>33</sup> Liberty 2026-2028 Base WMP R1, page 105.

<sup>34</sup> PG&E 2026-2028 Base WMP R2, page 152; SDG&E 2026-2028 Base WMP R2, page 135.

<sup>35</sup> Liberty's Errata, PDF page 4.

<sup>36</sup> Revision Notice, page 9.

## Required Remedies: Using the Recalculated Risk Reduction Values, Evaluate Risk Model Scenarios and Update Tables and Figures

Following its Revision Notice Response and revised 2026-2028 Base WMP R1 submission, Liberty submitted substantive errata to R1. The errata provided revised number risk model scenarios and the subsequent updated tables and figures, which satisfactorily addressed this required remedy. However, without accurate risk reduction values, these updates are of limited use when it comes to proper mitigation selection.

### **3.2.4 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.**

Liberty has repeatedly failed to provide sufficient and satisfactory responses to Energy Safety regarding its covered conductor target selection since 2023. The required responses were first introduced in Energy Safety’s September 2023 Revision Notice on Liberty’s 2023-2025 Base WMP due to Liberty reporting a decreased rate of covered conductor targets.<sup>37</sup> Energy Safety required Liberty to provide an “analysis of its SRP and traditional hardening mitigation activities, and adjust its hardening targets.”<sup>38</sup> Energy Safety’s Decision on that WMP included area for continued improvement LU-23-06 due to Liberty’s incomplete critical issue response.<sup>39</sup> In Energy Safety’s Decision on Liberty’s 2025 WMP Update, Energy Safety reissued the area for continued improvement from the 2023 Decision, as LU-23B-06.<sup>40</sup>

Once again, Liberty did not provide a sufficient response to the required reporting in its 2026-2028 Base WMP R0 submission. For area for continued improvement LU-23B-06, Energy Safety required Liberty to “provide calculations for ignition reduction effectiveness for covered conductor compared to SRP, traditional overhead hardening, and SRP in combination with traditional hardening.”<sup>41</sup>

In the Revision Notice, Energy Safety required Liberty to fully respond to the area for continued improvement LU-23B-06 by providing ignition reduction effectiveness for the projects and activities it outlines in Table 1-2 of its 2026-2028 Base WMP.<sup>42</sup> Additionally, as per the original requirements of area for continued improvement LU-23B-06, Energy Safety

---

<sup>37</sup> Revision Notice, page 10.

<sup>38</sup> Revision Notice, page 10.

<sup>39</sup> Revision Notice, page 10.

<sup>40</sup> Revision Notice, page 11.

<sup>41</sup> Revision Notice, page 11.

<sup>42</sup> Revision Notice, page 12.

required Liberty to demonstrate how it considered various ignition risk drivers, deployment time, and resources, as well as provide performance comparison in forested versus non-forested areas, and risk model output of riskiest areas.<sup>43</sup> Further, Energy Safety required an explanation of Liberty's methodology and analysis to determine covered conductor targets.<sup>44</sup>

### **3.2.4.1 RN-LU-26-04: Energy Safety Evaluation of Liberty's Response**

Liberty did not satisfactorily respond to all the required elements regarding ignition reduction effectiveness and covered conductor target selection analysis as required by the Revision Notice, as discussed below.

#### **Required Remedy: Provide Ignition Reduction Effectiveness**

In its Revision Notice Response and revised 2026-2028 Base WMP R1, Liberty provided covered conductor effectiveness values substantially lower than other electrical corporations, and its values were simulations of only two projects instead of its service territory as required in the area for continued improvement and Revision Notice remedy.<sup>45,46</sup> Based on the effectiveness calculations presented, Liberty concluded that "normal replacement" (bare wire) has higher ignition risk reduction than "covered conductor" installation even though other electrical corporations' effectiveness calculations have consistently demonstrated otherwise.<sup>47,48</sup> Liberty's conclusion leads to doubts about the accuracy of Liberty's effectiveness calculations for undergrounding, covered conductor, bare wire, and SRP. Furthermore, Liberty's lack of analysis, calculations, and validation to support its conclusion demonstrates Liberty's inability to understand and quality check its calculation outputs to reduce wildfire risk in its service territory.

For that reason, Liberty's response is unsatisfactory and Energy Safety is still concerned about Liberty's understanding of its ignition reduction effectiveness.

#### **Required Remedy: Demonstrate Comparison**

Liberty's Revision Notice Response and revised 2026-2028 Base WMP R1 satisfactorily provided performance comparison in forested versus non-forested areas, risk model output of riskiest areas, and narrative.

---

<sup>43</sup> Revision Notice, page 12.

<sup>44</sup> Revision Notice, page 12.

<sup>45</sup> Revision Notice Response, page 19.

<sup>46</sup> Liberty's Errata, PDF page 9.

<sup>47</sup> Revision Notice Response, page 18.

<sup>48</sup> Joint IOU Grid Hardening Working Group Report, pages 3-12.

## Required Remedy: Discuss Covered Conductor Target Selection Analysis

In its Revision Notice Response and revised 2026-2028 Base WMP R1, Liberty provided a discussion but did not include the required analysis to support its conclusions for determining covered conductor targets. The missing analysis makes it unclear if the effectiveness calculations impacted Liberty's mitigation activity target selection for covered conductor.<sup>49</sup> Once again, Liberty failed to supply Energy Safety with the required analysis to support its mitigation activity target selection.

The repeated incomplete responses since 2023 prevent transparency on Liberty's strategies and decision-making for mitigating the risk of catastrophic wildfire in its service territory.

Without supporting analysis, Liberty's response is unsatisfactory and Energy Safety is still concerned about how Liberty selects covered conductor targets.

### **3.2.5      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.**

In its Decision on Liberty's 2025 WMP Update, Energy Safety issued area for continued improvement LU-25U-04 regarding the cost-benefit analysis for Liberty's Stateline Resiliency Project.<sup>50</sup>

In its 2023-2025 Base WMP, Liberty proposed the Stateline Resiliency Project undergrounding effort.<sup>51</sup> In its 2025 WMP Update, Liberty backtracked and said it was instead focusing on a Tahoe Vista Project underground effort even though the circuits covered by the Stateline Resiliency Project had a 30 percent higher composite risk score than the circuits covered by the Tahoe Vista Project.<sup>52</sup> In its 2025 WMP Update Decision, Energy Safety asked Liberty for documentation and narrative supporting this decision.<sup>53</sup>

In its 2026-2028 Base WMP R0, Liberty did not provide supporting documentation for its Stateline Resiliency Project cost-benefit analysis, once again raising concerns regarding Liberty's decision-making.<sup>54</sup>

In the Revision Notice, Energy Safety required Liberty to fully respond to the area for continued improvement by providing an explanation of its current cost-benefit analysis and

---

<sup>49</sup> Revision Notice Response, pages 19-21.

<sup>50</sup> Revision Notice, page 13.

<sup>51</sup> Liberty's 2023-2025 Base WMP R2, page 163.

<sup>52</sup> Decision on Liberty's 2025 WMP Update, pages 26.

<sup>53</sup> Decision on Liberty's 2025 WMP Update, pages 59-60.

<sup>54</sup> Revision Notice, page 15.

decision-making process for its undergrounding programs, and documentation to support its methodology, calculations, and estimates used to determine the cost values as required by LU-25U-04.<sup>55</sup>

### **3.2.5.1 RN-LU-26-05: Energy Safety Evaluation of Liberty's Response**

Liberty failed to provide accurate cost-benefit calculations and explanations, as well as supporting documentation for its cost-benefit analysis, as discussed below.

#### **Required Remedy: Explain Cost-Benefit Analysis and Decision-Making Process**

Liberty did not explain its cost-benefit analysis for its undergrounding program. Liberty's cost-benefit formula is inaccurate and unsupported, raising larger concerns about Liberty's understanding of risk across its service territory.

The area for continued improvement, LU-25U-04, and the Revision Notice specifically required Liberty to provide a cost-benefit ratio. In its Revision Notice Response, Liberty defined its cost-benefit ratio as "effectiveness divided by cost,"<sup>56</sup> making it a rate instead of a ratio. The WMP Guidelines allow for Risk Spend Efficiency (RSE), defined as a rate and as risk reduction per dollar, or cost-benefit ratio (CBR) for *Table 6-3, Example of Risk Impact of Activities*;<sup>57</sup> however, Liberty's calculations are flawed and do not meet industry standards for CBR (a ratio) or the Guideline's definition for RSE (a rate).<sup>58</sup> Additionally, Liberty failed to provide supporting narrative to explain its choice in equations and how its calculations can accurately inform its decisions.

Cost-benefit scores are a factor used in activity selection and prioritization. With an inaccurate cost-benefit score at a fundamental level, Liberty cannot determine if its mitigation strategies are correct or if planned mitigation activities are an appropriate allocation of resources to reduce chances of a catastrophic wildfire.

Liberty's response is unsatisfactory and Energy Safety is still concerned about the accuracy of Liberty's cost-benefit score and decision-making process.

#### **Required Remedy: Provide Documentation Supporting Cost-Benefit Ratios**

In its Revision Notice Response and revised 2026-2028 Base WMP R1, Liberty did not provide clear documentation of the analysis supporting its cost-benefit score outcomes.<sup>59</sup> Liberty's

---

<sup>55</sup> Revision Notice, page 15.

<sup>56</sup> Revision Notice Response, page 23.

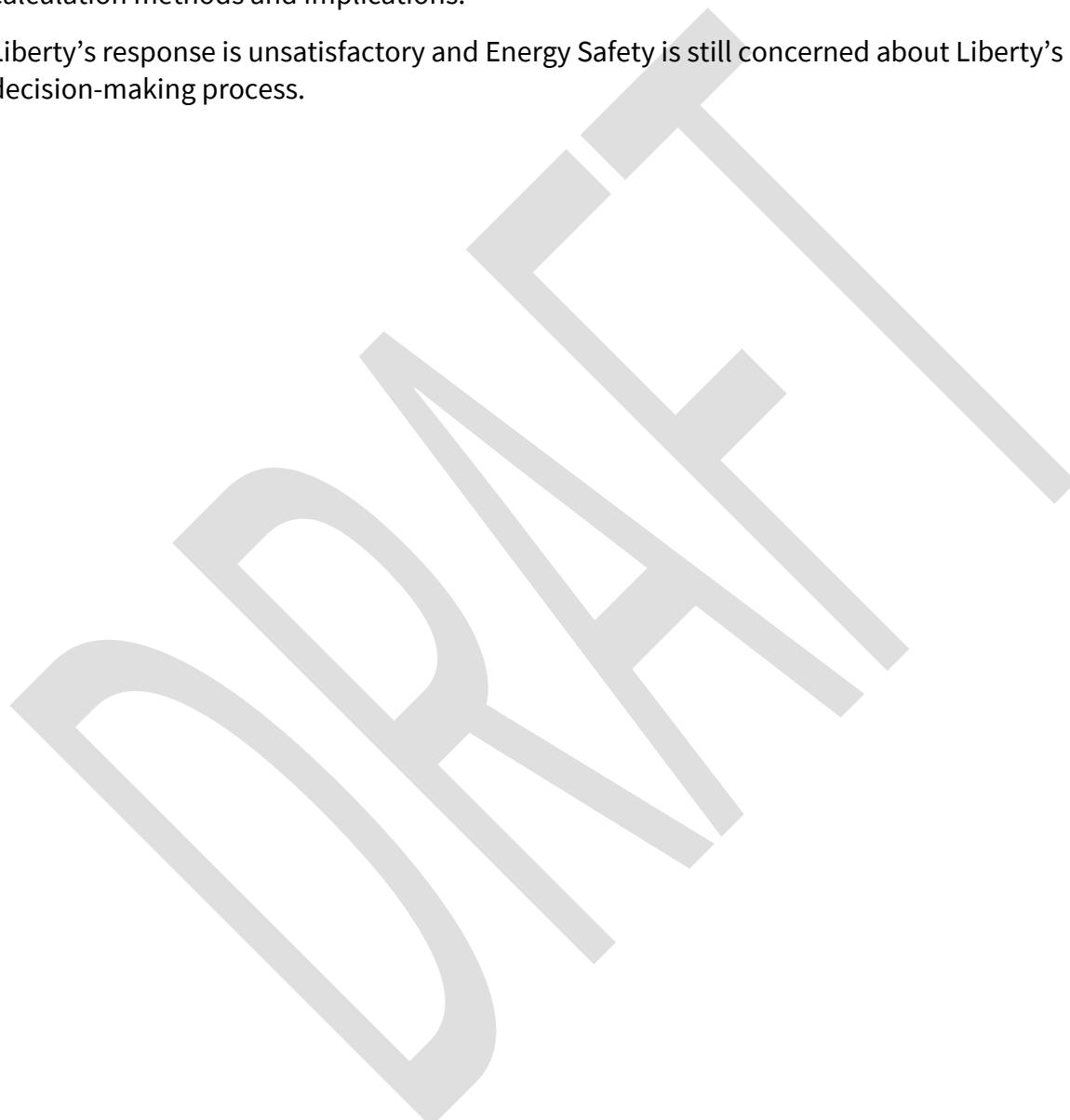
<sup>57</sup> WMP Guidelines, page 75.

<sup>58</sup> Liberty's 2026-2028 Base WMP R1, Appendix D, PDF page 545.

<sup>59</sup> Revision Notice Response, pages 23-25.

response, as detailed above, lacked both a transparent methodology and necessary documentation to validate the data in *Table 1-6, Cost Benefit Analysis of Stateline Resiliency Project*.<sup>60</sup> Failing to provide documentation supporting its unorthodox calculations and outcomes demonstrates that Liberty does not have an understanding of its effectiveness calculation methods and implications.

Liberty's response is unsatisfactory and Energy Safety is still concerned about Liberty's decision-making process.



---

<sup>60</sup> Liberty's Errata, PDF page 10.

# 4. Conclusion

## 4.1 Discussion

The Liberty 2026-2028 Base WMP is denied. Energy Safety has raised concerns with Liberty's risk model since 2023 by identifying critical issues and areas for continued improvement. Liberty has not demonstrated the necessary improvement. Instead, five critical issues remain outstanding. Fundamentally, Liberty's risk model produces invalid outputs and therefore is ineffective for assessing and mitigating risk. In the three years since Energy Safety first identified this issue, Liberty has not demonstrated an acceptable level of progress or forward-looking growth.

## 4.2 Liberty's Wildfire Mitigation Work in 2026

Liberty has a continuing obligation under the law to construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment.<sup>61</sup> While Liberty is revising its risk model, wildfire mitigation work must continue. Energy Safety will be monitoring Liberty's work through performance assessment and oversight that will include regular progress reports, inspections, and audits. Liberty must continue to file quarterly data reports. Liberty staff is expected to continue regular meetings with Energy Safety staff to discuss its mitigation activities. Energy Safety will continue to complete inspections and audits of Liberty's wildfire mitigation management throughout 2026.

## 4.3 Next Steps

Liberty must submit a 2027 Base WMP to Energy Safety no earlier than August 31, 2026, and no later than November 30, 2026. Within 30 days of the publication of the Decision,<sup>62</sup> Liberty must submit a letter to Energy Safety's 2026-2028 Base WMP docket (#2026-2028-Base-WMPs)<sup>63</sup> with a specific proposed date within this range for when it will submit its 2027 Base WMP. Additionally, Liberty must coordinate with Energy Safety and provide a meeting to present on its revised risk model at least 30 calendar days prior to its submission of a 2027 Base WMP. The presentation must at minimum include a discussion of all five critical issues and their corresponding remedies.

---

<sup>61</sup> Public Utilities Code section 8386 (a).

<sup>62</sup> "Decision" as referenced is the final publication of the decision, not the draft.

<sup>63</sup> [2026-2028-Base-WMPs](#).

Separately, in 2027, Liberty, along with the other electrical corporations, will submit a new four-year Base WMP covering 2028-2031, pursuant to the final version of the WMP Submission Schedule, a draft of which was published on January 26, 2026.<sup>64</sup>

Liberty must also coordinate with Energy Safety's Performance Assessment, Environmental Science, Data Analytics, and Electrical Safety Policy divisions as it completes wildfire mitigation work in 2026 and prepares for its next WMP submission.

### 4.3.1 Liberty WMP Submission Schedule

Liberty Risk Model Presentation	At least 30 days prior to WMP submission
Liberty 2027 Base WMP Due	Between August 31 – November 30, 2026

Upon receipt of Liberty's 2027 Base WMP, Energy Safety will set stakeholder and reply comments due dates, and the expected date of the draft Decision or Revision Notice in a separate schedule.

---

<sup>64</sup> [Wildfire Mitigation Plan Submission Schedules](#).

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

DRAFT



OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
A California Natural Resources Agency  
[www.energysafety.ca.gov](http://www.energysafety.ca.gov)  
715 P Street, 15th Floor  
Sacramento, CA 95814  
916.902.6000





# APPENDICES

## APPENDICES

Appendix A. References Table .....	A-2
Appendix B. Public Comments .....	A-4
Public Comments on the Liberty 2026-2028 Base WMP .....	A-4
Public Comments on the Liberty Revision Notice Response and Revised 2026-2028 Base WMP .....	A-7

DRAFT

# Appendix A. References Table

Citation	Reference
2026-2028-Base-WMPs	Office of Energy Infrastructure Safety, <a href="#">2026-2028-Base-WMPs Docket</a> , URL: ( <a href="https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs">https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs</a> ).
D.14-02-015	California Public Utilities Commission, <a href="#">Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric utility Facilities and Aerial Communication Facilities (D.14-02-015)</a> , Issued February 10, 2024, URL: ( <a href="https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M087/K892/87892306.PDF">https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M087/K892/87892306.PDF</a> ).
DR-012 Response	Liberty Utilities, <a href="#">Liberty Response to DR No. OEIS-P-WMP 2025-Liberty-012 Q01-05</a> , Published December 17, 2025, URL: ( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59929&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59929&amp;shareable=true</a> ).
Joint IOU Grid Hardening Working Group Report	Joint IOU Grid Hardening Working Group, <a href="#">aci-25u-03-continuation-of-grid-hardening-joint-studies.pdf</a> , Accessed February 9, 2026, URL: ( <a href="https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/aci-25u-03-continuation-of-grid-hardening-joint-studies.pdf">https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/aci-25u-03-continuation-of-grid-hardening-joint-studies.pdf</a> ).
Liberty's 2023-2025 Base WMP R2	Liberty Utilities, <a href="#">Liberty 2023-2025 Base Wildfire Mitigation Plan R2</a> , Published October 6, 2023, URL: ( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55765&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55765&amp;shareable=true</a> ).
Liberty's 2026-2028 Base WMP R1	Liberty Utilities, <a href="#">Liberty 2026-2028 Base-WMP R1 Clean REDACTED</a> , Published December 4, 2025, URL: ( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59813&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59813&amp;shareable=true</a> ).
Liberty's Errata	Liberty's Substantive Errata Request, <a href="#">Liberty 2026-2028 Base-WMP R1 Substantive Errata Request</a> , Published December 18, 2025, URL:

Citation	Reference
	<a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59936&amp;shareable=true">(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59936&amp;shareable=true).</a>
PG&E 2026-2028 Base WMP R2	PG&E, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59363&amp;shareable=true">PGE 2026-2028 Base-WMP Vol1 R2</a> , Published September 9, 2025, URL: <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59363&amp;shareable=true">(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59363&amp;shareable=true).</a>
Pub. Res. Code § 4525.7	Public Resources Code section 4525.7, Added 1973, URL: <a href="https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4525.7.&amp;lawCode=PRC">(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4525.7.&amp;lawCode=PRC).</a>
Pub. Util. Code § 8386	Public Utilities Code section 8386, Effective January 1, 2022, URL: <a href="https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8386&amp;lawCode=PUC">(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8386&amp;lawCode=PUC).</a>
Revision Notice	Office of Energy Infrastructure Safety, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59504&amp;shareable=true">Revision Notice on the Liberty 2026-2028 Base WMP</a> . Published October 21, 2025, URL: <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59504&amp;shareable=true">(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59504&amp;shareable=true).</a>
Revision Notice Response	Liberty Utilities, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59812&amp;shareable=true">Liberty 2026-2028 Base WMP - Revision Notice Response</a> , Published December 4, 2025, URL: <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59812&amp;shareable=true">(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59812&amp;shareable=true).</a>
SDG&E 2026-2028 Base WMP R2	SDG&E, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59448&amp;shareable=true">SDG&amp;E 2026-2028 Base-WMP R2</a> , Published September 30, 2025, URL: <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59448&amp;shareable=true">(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59448&amp;shareable=true).</a>
WMP Guidelines	Office of Energy Infrastructure Safety, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&amp;shareable=true">Wildfire Mitigation Plan Guidelines</a> , Published February 24, 2025, URL: <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&amp;shareable=true">(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&amp;shareable=true).</a>

# Appendix B.

## Public Comments

### Public Comments on the Liberty 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the Liberty 2026-2028 Base WMP. The following individuals and organizations submitted comments:

- Green Power Institute (GPI)
- TAHOE SPARK

Comments received on the Liberty 2026-2028 Base WMP can be viewed in the 2026-2028 Base WMP (2026-2028-Base-WMPs) docket log.

Energy Safety concurred with and incorporated the following comments into this Decision for the Liberty 2026-2028 Base WMP:

- GPI commented that Liberty's risk model normalization oversimplified wildfire consequence ratings, and that it needed to update and explain its consequence calculation methods.
  - Energy Safety cited GPI's comment in the Revision Notice on Liberty's 2026-2028 Base WMP, critical issue RN-LU-26-01: Liberty's risk modeling framework and calculations overemphasized Public Safety Power Shutoff (PSPS) and outage risk.
- TAHOE SPARK commented that Liberty's risk model development would benefit from incorporating several standard variables such as vegetation condition, temperature, and historical wildfire data as well as calibrating against forecasted growing visitor traffic, including day use population figures.
  - Energy Safety concurred with Tahoe Spark as seen in Sections 3.2.1 and 3.2.2 of this Decision regarding improvements needed on Liberty's risk model.
- GPI commented that Liberty's averaging of wildfire and outage risk were unclear and not in line with industry best practices.
  - Energy Safety concurred with this concern as seen in the Revision Notice on Liberty's 2026-2028 Base WMP, critical issue RN-LU-26-01: Liberty's risk modeling framework and calculations overemphasized Public Safety Power Shutoff (PSPS) and outage risk. The critical issue was not satisfactorily addressed in Liberty's Revision Notice Response and is discussed further in this Decision.

- GPI commented that Liberty's risk planning model needed an actionable improvement plan to address shortcomings identified through its third-party platform.
  - Energy Safety concurred with this concern as seen in the Revision Notice on Liberty's 2026-2028 Base WMP, critical issue 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. The critical issue was not satisfactorily addressed in Liberty's Revision Notice Response and is discussed further in this Decision.
- GPI commented that Liberty should reassess its risk model methodologies because it lacked clarification on how it determined thresholds or effectiveness metrics for its third-party risk assessment tool output.
  - Energy Safety concurred with this concern as seen in the Revision Notice on Liberty's 2026-2028 Base WMP, critical issue RN-LU-26-03: Liberty's risk reduction assessment lacked maturity and did not accurately assess mitigation activities' effectiveness. The critical issue was not satisfactorily addressed in Liberty's Revision Notice Response and is discussed further in this Decision.
- GPI commented that Liberty should provide more details regarding its Tahoe Vista and Stateline projects.
  - Energy Safety a concurred with this concern as seen in the Revision Notice on Liberty's 2026-2028 Base WMP, critical issue RN-LU-26-04: Liberty's response to area for continued improvement LU-25U-04 "Cost-Benefit Analysis for the Stateline Resiliency Project," was insufficient. The critical issue was not satisfactorily addressed in Liberty's Revision Notice Response and is discussed further in this Decision. GPI commented that Liberty should develop more frequent inspections in high-risk areas.
  - Energy Safety addressed this concern in its Revision Notice on Liberty's 2026-2028 Base WMP, critical issue RN-LU-26-06: Liberty's response to area for continue improvement LU-23B-10 "Distribution Detailed Inspection Frequency," was insufficient. The critical issue was satisfactorily addressed in Liberty's Revision Notice Response.
- GPI commented that Liberty should conduct pilot drone inspections and report on the outcomes.
  - Energy Safety addressed this concern in its Revision Notice on Liberty's 2026-2028 Base WMP, critical issue RN-LU-26-07: Liberty's response to area for continued improvement LU-25U-06 "Additional Inspection Practices," was insufficient. The critical issue was satisfactorily addressed in Liberty's Revision Notice Response.
- GPI commented that Liberty should perform infrared inspections on its transmission assets.

- Energy Safety addressed this concern in its Revision Notice on Liberty's 2026-2028 Base WMP, critical issue RN-LU-26-07: Liberty's response to area for continued improvement LU-25U-06 "Additional Inspection Practices," was insufficient. The critical issue was satisfactorily addressed in Liberty's Revision Notice Response.

DRAFT

## Public Comments on the Liberty Revision Notice Response and Revised 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the Liberty Revision Notice Response and revised 2026-2028 Base WMP. No members of the public provided comments.

DRAFT