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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Docket# 2026–2028-Base-WMP

Via: Electronic Submission

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

Re: Opening Comments of Liberty Utilities (CalPeco Electric) LLC (U 933-E) on Office of Energy Infrastructure Safety Draft Decision on Liberty 2026–2028 Base WMP

Dear Deputy Director Marino,

Liberty Utilities (CalPeco Electric) LLC ("Liberty") submits the attached opening comments on the Office of Energy Infrastructure Safety's ("Energy Safety") Draft Decision on Liberty's 2026–2028 Base WMP issued on February 18, 2026.

Liberty appreciates the work Energy Safety has undertaken in reviewing Liberty's 2026–2028 Base WMP and preparing the Draft Decision, and Liberty shares Energy Safety's goal to minimize the risk of wildfires caused by electrical infrastructure. For the reasons set forth in Liberty's opening comments, Liberty urges Energy Safety not to move forward with a denial of Liberty's 2026–2028 Base WMP and instead to issue a conditional approval based on the measurable commitments and milestones set forth in the Appendix to Liberty's opening comments.

Sincerely,

Eric Schwarzrock
President

Opening Comments of Liberty Utilities (CalPeco Electric) LLC (U 933-E) on Office of Energy Infrastructure Safety Draft Decision on Liberty 2026–2028 WMP

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I. EXECUTIVE SUMMARY

Liberty Utilities (CalPeco Electric) LLC ("Liberty") submits these Opening Comments on the Office of Energy Infrastructure Safety's ("Energy Safety") Draft Decision denying Liberty's 2026–2028 Base Wildfire Mitigation Plan ("Draft Decision"). Liberty appreciates the work Energy Safety has undertaken in reviewing Liberty's 2026–2028 Base Wildfire Mitigation Plan ("WMP") and preparing the Draft Decision, and Liberty shares Energy Safety's goal to minimize the risk of wildfires caused by electrical infrastructure. For the reasons set forth herein, Liberty respectfully urges Energy Safety to approve Liberty's 2026–2028 Base WMP with specified conditions.

Liberty recognizes the significance of the five remaining critical issues identified by Energy Safety. Liberty acknowledges that its response to Energy Safety's Revision Notice on Liberty's 2026–2028 Base WMP should have been clearer and more complete. Liberty has taken significant and ambitious steps to develop complex risk modeling since Energy Safety began raising concerns in 2023. As a smaller utility, Liberty has engaged the expertise of third-party consultants, but unfortunately this effort has not yet yielded the results Liberty seeks. Liberty recognizes the critical need to further advance, refine, and calibrate its risk modeling and, in particular, the link to wildfire mitigation spending. Liberty is committed to improving, in candid collaboration with Energy Safety.

Since issuance of the Draft Decision, Liberty has identified concrete actions and commitments to address Energy Safety's remaining concerns and achieve needed risk modeling improvements in the near term. These actions and commitments—summarized in Table 1 below—demonstrate that Liberty will hold itself accountable starting immediately to meeting measurable commitments, with defined milestones.

One key development is Liberty's recent engagement of Filsinger Energy Partners ("Filsinger") as an independent advisor to drive continued improvement of Liberty's risk modeling and wildfire mitigation program. Filsinger is a trusted industry consultant with substantial expertise in utility risk modeling and best practices for wildfire mitigation. In the coming months, Liberty will work closely with Filsinger to refine the inputs and assumptions of its risk modeling and to restructure Liberty's approach to mitigation effectiveness calculations to better support decision-making, spending priorities, and transparency. Liberty will incorporate material progress from the Filsinger collaboration in the 2027 WMP Update that Liberty proposes to file on August 31, 2026, as described below.

As Liberty undertakes this important work to further mature its risk modeling, Liberty remains focused on executing and enhancing its wildfire mitigation strategies described in the 2026–2028 Base WMP R1. Liberty's 2026 wildfire mitigation targets and projects reflect reliable, proven mitigation strategies that will achieve significant reductions in Liberty's wildfire risk. To address Energy Safety's remaining concerns, Liberty commits to align its planned pole replacement and expulsion fuse replacement work for the remainder of 2026 with the recalibrated wildfire-only risk scores reflected in the 2026–2028 Base WMP R1. For 2026, Liberty commits to increase its (1) expulsion fuse replacement target from 500 to 1,000 (a 100% increase), and (2) covered conductor installation target from 3.9 miles to 7 miles (a 79% increase). Liberty will further revise its WMP targets and planned work for 2027 and 2028 based

on the further advancements to its risk modeling and would include these revised targets and plans in the 2027 WMP Update.

In light of Liberty's immediate commitment to resolving Energy Safety's remaining concerns by meeting measurable milestones in the continued advancement of its risk modeling, Liberty respectfully urges Energy Safety to issue a conditional approval, not a denial, of its 2026–2028 Base WMP. Specifically, Liberty requests that Energy Safety approve its 2026–2028 Base WMP R1 conditioned on a set of enforceable requirements mapped to Energy Safety's stated deficiencies and to the corrective actions and commitments set forth in the attached Appendix.[1] As one such condition, Liberty proposes to file on August 31, 2026, a 2027 WMP Update so that Energy Safety can track Liberty's progress executing on the commitments and risk modeling improvements described herein. Liberty further proposes monthly meetings with Energy Safety's Electric Safety Policy Division to provide ongoing updates regarding its progress as it works toward the 2027 WMP Update milestone. Finally, Liberty proposes to meet with Energy Safety on or before July 31, 2026, to preview the 2027 WMP Update and present improvements in Liberty's risk modeling. Through these additional layers of transparency and oversight, Liberty is committed to restoring Energy Safety's confidence in Liberty's wildfire mitigation program.

Conditional approval will allow Energy Safety to oversee Liberty's critical wildfire mitigation work in 2026, including its engagement of Filsinger to support risk modeling, and ensure accountability and oversight.[2] Conditional approval also will provide a constructive path for Liberty consistent with Energy Safety's approach to other utilities' WMPs, including where there is an identified need for continued improvement of risk models. Liberty's engagement of Filsinger, in conjunction with the conditions proposed in the Appendix, is designed to expeditiously advance Liberty's risk modeling so that Liberty can reliably demonstrate to Energy Safety that its spending is aligned with safety and the most cost-efficient wildfire risk mitigation work.[3] Thus, conditional approval would advance public safety, further key goals of the statutory

[1] Alternatively, Energy Safety could issue a Second Revision Notice authorizing Liberty to file within 30 days a further revised (R2) version of its 2026–2028 Base WMP that incorporates the corrective actions and commitments described herein to support conditional approval of the plan by Energy Safety.

[2] *See* Pub. Util. Code § 8386.3(b) ("Following approval of a wildfire mitigation plan . . . , the office shall oversee the implementation of the plan . . . ."); Office of Energy Infrastructure Safety, *2024-2029 Strategic Plan* (Sept. 2024), *available at* https://energysafety.ca.gov/wp-content/uploads/2025/01//final-energy-safety-ext-doc-1-24-25_-002.pdf (outlining the goal of "partnership" and achieving it through "[e]ngag[ing] stakeholders to deploy effective approaches to infrastructure safety risk identification, risk mitigation, and responsiveness to infrastructure risk-induced community vulnerability").

[3] *See* Pub. Util. Code § 326(a)(2) (requiring only that Energy Safety use metrics for risk reduction that can be "accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors").

framework,[4] and promote Energy Safety's oversight function. Conditional approval also would be in the best interest of Liberty, its customers, and the communities it serves.

Denial, by contrast, risks undermining Liberty and Energy Safety's shared goal of improving wildfire mitigation. Denial would not improve wildfire safety outcomes, which are best served by a conditional approval as described above. Moreover, denial would unfairly penalize Liberty for its ambitious risk modeling goals because of stumbling blocks that have arisen during development and calibration of a complex risk model, notwithstanding strong dedication and effort by Liberty as a smaller utility. Indeed, Energy Safety identified Liberty's risk modeling improvements as a strength in its 2025 WMP Update so denial of Liberty's 2026–2028 Base WMP following continued work on its risk modeling would be perceived as particularly drastic and arbitrary. This would send the wrong message to Liberty and its peer utilities and would ultimately undermine the goals of the statutory framework. Finally, denial would make Liberty an outlier compared to its peer utilities by requiring Liberty to operate during the 2026 fire season without an approved WMP. It would unnecessarily increase risk and costs for Liberty and its customers, potentially through higher wildfire insurance cost and a higher cost of capital.

Liberty urges Energy Safety not to move forward with a denial of Liberty's 2026–2028 Base WMP and instead to issue a conditional approval based on the measurable commitments and milestones set forth in the Appendix, key highlights of which are summarized in Table 1.

Table 1

Issue	Actions/Commitments Responding to Draft Decision
Expanded Reporting to Energy Safety	On August 31, 2026, Liberty will submit a 2027 WMP Update to Energy Safety. On or before July 31, 2026, Liberty will meet with Energy Safety to preview the 2027 WMP Update and present improvements in Liberty's risk modeling.
	By April 30, 2026, Liberty will begin monthly updates to Energy Safety's Electric Safety Policy Division on the progress of Liberty's risk modeling and Risk Assessment Improvement Plan (in addition to continuing its monthly updates to Energy Safety's Performance Assessment and Environmental Science Divisions).

[4] *See* Pub. Util. Code § 8386(d)(14) ("A description of the actions the electrical corporation will take to ensure its system will achieve the highest level of safety, reliability, and resiliency, taking into account the cost and time required to achieve those benefits . . . . The electrical corporation shall present the cost-efficiency measures adopted by the commission . . . for at least two reasonable mitigation alternatives for a given identified wildfire risk."); *id.*, § 8386(d)(18) ("A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk that is consistent with the methodology used by other electrical corporations unless the commission determines otherwise.").

Risk Modeling	Liberty has engaged Filsinger as an independent advisor to drive continued improvement of Liberty's risk modeling framework, including independent review of the risk model; Liberty held a risk modeling workshop with Filsinger on March 4, 2026 and will schedule joint meetings and field visits by April 2026.
	Liberty is developing a new process to engage local fire agencies and public safety partners in joint field visits and meetings to discuss wildfire risk in Liberty's service area and validate risk model outputs; Liberty will initiate this process by May 29, 2026.
	Liberty will further refine its 2026–2028 Base WMP targets and planned work for 2027/2028 based on risk modeling updates and will incorporate these updates in its 2027 WMP Update to be filed on August 31, 2026.
RN-LU-26-01: Aligned Mitigation Targets with Risk Weighting	Liberty is increasing targets and re-focusing planned work for 2026 to better align its efforts with the recalibrated wildfire-only risk outputs: • Expulsion fuse replacement target is now 1,000, up from 500; • Future pole replacements and expulsion fuse replacements for the remainder of 2026 will be focused on 19 circuits with the highest recalibrated wildfire-only risk scores; and • Covered conductor target is now 7 miles, up from 3.9 miles, with roughly 3 miles of new covered conductor work, including work previously planned as traditional overhead hardening.
	In its 2027 WMP Update, Liberty will provide revised 2027 and 2028 mitigation targets and updated circuit-to-mitigation mapping tables to show the recalibrated model aligns with its mitigation portfolio. Liberty will also update the calculated risk reduction from planned work based on the adjusted targets and improved risk modeling.

RN-LU-26-02: Risk Governance / Validation	Liberty will implement the following steps to support internal governance and to formalize and strengthen its validation framework: • Adopt a Risk Focus Group Charter by May 29, 2026, as well as defined requirements for meetings and model review; • Add Liberty's President to the Risk Focus Group to ensure executive-level oversight and engagement in Liberty's risk modeling; • Onboard a Lead Risk Analyst by June 30, 2026 to oversee the risk modeling program, chair the Risk Focus Group, and report directly to Liberty's Senior Manager, Wildfire Prevention; • Adopt a formal validation protocol governing the Risk Focus Group's review and approval of key model inputs, assumptions, and outputs by July 31, 2026; • Require monthly progress reports from the President of Liberty CalPeco to Algonquin Power & Utilities Corp.'s Compliance Committee and Enterprise Compliance Leader; • Document progress under the Risk Assessment Improvement Plan by July 31, 2026.
RN-LU-26-03 and RN-LU-26-04: Risk Reduction Effectiveness	Liberty will refine its risk reduction effectiveness analysis with support from Filsinger and restructure its approach to mitigation effectiveness calculations, by July 31, 2026. Liberty will present in a 2027 WMP Update on August 31, 2026 revised, territory-wide ignition risk reduction calculations for covered conductor, traditional overhead hardening, and undergrounding, along with refined targets and projects for 2027 and 2028 based on risk modeling improvements.
RN-LU-26-05: Cost-Benefit Analysis	Liberty will work with Filsinger to restructure its effectiveness calculations to support presentation of Risk Spend Efficiency ("RSE") calculations for planned wildfire mitigation projects consistent with WMP Guidelines; Liberty will update Energy Safety on this effort by July 31, 2026, as well as in a 2027 WMP Update on August 31, 2026.

II. LIBERTY'S COMMITMENT TO CONTINUOUS IMPROVEMENT OF ITS RISK MODELING

A. Liberty's Progress Since 2023

Liberty acknowledges that its risk modeling requires continued refinement. At the same time, Liberty has made substantial and measurable progress since 2023 toward developing an effective risk modeling framework. Because no off-the-shelf utility wildfire risk modeling

platform exists, and because Liberty is a smaller utility with proportionally fewer internal resources than the large California utilities, Liberty sought specialized third-party support to build out its risk modeling capability. Liberty turned to the wildfire ignition modeling expertise of Technosylva, which is broadly used across the utility industry. Technosylva's FireRisk and FireSight wildfire risk modeling tools must be paired with asset-based modeling to enable probabilistic wildfire risk assessment based on ignition and propagation likelihood.

Thus, in 2023, Liberty engaged Direxyon Technologies—a firm with expertise in utility asset strategy, including failure modeling and investment planning, that supports electric utilities throughout North America. Liberty worked with Direxyon to build an asset risk model and to integrate it with Technosylva's wildfire risk modeling. In close coordination with both vendors, Liberty developed the Direxyon Risk Assessment Tool, which models wildfire risk across Liberty's service area based on asset condition and type, as well as locational characteristics such as vegetation, topography, and local historical weather data. The Direxyon model also measures risk reduction by investment impact on an asset-specific basis. Despite Liberty's strong dedication and effort working with Direxyon and Technosylva, challenges have arisen in developing and calibrating such a complex risk model and making it fully operational in its link to wildfire mitigation spending. Liberty recognizes the need to drive critical advancements to its risk modeling in the near term in order to yield the results Liberty seeks.

B. Liberty's Commitment to Continued Advancement and Transparency

Liberty is committed to further maturing its wildfire risk modeling framework and strengthening its validation and continuous improvement processes. This effort goes beyond specifically addressing the five remaining critical issues identified by Energy Safety described in Part III.

Liberty is hiring its first dedicated Lead Risk Analyst to oversee and advance Liberty's risk modeling program and ensure continuous improvement. Liberty has identified a well-qualified candidate for this position with extensive experience in this space and anticipates that the new analyst will be onboarded by June 30, 2026.

More immediately, Liberty has engaged Filsinger as an independent advisor to drive further improvement of Liberty's risk modeling and wildfire mitigation program, including independent review of the risk model. Filsinger brings substantial knowledge and experience with respect to wildfire mitigation best practices in California and beyond, and specialized expertise in risk assessment and modeling. In the coming months, Liberty will work with Filsinger to validate and refine the inputs and core assumptions of Liberty's risk model and to restructure Liberty's mitigation effectiveness calculations to align with Energy Safety's guidance. Liberty will incorporate material improvements from the collaboration with Filsinger in a 2027 WMP Update, which Liberty proposes to file on August 31, 2026. Liberty will work closely with Energy Safety to ensure transparency and overall alignment with Energy Safety's expectations. Liberty has built a strong risk modeling foundation and is confident the Filsinger engagement will drive measurable improvements to strengthen and refine Liberty's risk modeling framework and its connection to wildfire mitigation spending.

In addition to the Risk Focus Group process improvements described in response to RN-LU-26-02 below, Liberty is developing a new process seeking to engage local fire agencies and other public safety partners in joint field visits and meetings to discuss wildfire risk in Liberty's service area and to validate future outputs of Liberty's risk modeling. Liberty will initiate this process by May 29, 2026.

III. LIBERTY'S RESPONSES TO ENERGY SAFETY'S CONTINUING CONCERNS ON CRITICAL ISSUES

Energy Safety's Revision Notice on Liberty's 2026–2028 Base WMP R0 identified ten critical issues and described required remedies to address those issues. Liberty submitted a Revision Notice Response setting forth its responses to and remedies to address each issue. Concurrent with the Revision Notice Response, Liberty submitted R1 of its 2026–2028 Base WMP. The Draft Decision finds that five of the ten critical issues were not satisfactorily remedied through that revision.

In the below sections, Liberty addresses each of these five critical issues, expanding on the responses previously provided and proposing concrete remedies and commitments to address Energy Safety's remaining concerns in a manner that supports conditional approval of Liberty's 2026–2028 Base WMP. A full list of these remedies and commitments is set forth in the Appendix to these comments.

A. Response to RN-LU-26-01: Risk Weighting and Wildfire-Only Recalculation

In its Revision Notice to Liberty's 2026–2028 Base WMP R0, Energy Safety required that Liberty create a plan to adjust its risk scoring methodology to properly weight outage risk compared to wildfire risk. Specifically, Energy Safety found problems in (i) the scaling of Liberty's outage risk scores compared to other wildfire risk factors (*e.g.*, population, structure, and acreage impacts), and (ii) its method of averaging outage risk and wildfire risk, which overemphasized outage risk. Energy Safety directed Liberty to establish a plan to adjust its wildfire and outage risk scoring methodology to correct these shortcomings and, in the interim, to recalculate all risk scores and rankings using wildfire risk only. In response, Liberty identified specific adjustments it was making to "improve the calculation and scaling of outage risk."[5] It also provided the interim recalculations of wildfire-only risk.[6]

Notwithstanding these responses, the Draft Decision concludes that Liberty failed to provide a detailed plan for how it would implement its new risk score calculations, including a timeline and well-defined milestones for implementation. It also found that Liberty failed to

[5] *See* Revision Notice Response RA-7 (December 4, 2025), at 13–14. That is, Liberty proposed to recalibrate by: (i) removing PSPS and outage risk components from wildfire risk calculations; (ii) replacing averaging with summation of probability components, including "Probability of Asset Failure" and "Probability of Ignition"; (iii) incorporating historical wind data to refine asset-failure modeling; and (iv) recalculating circuit rankings using wildfire-only risk.

[6] *See* 2026–2028 Base WMP R1, Table 5-5.

address the impact on Liberty's mitigation activity targets of the revised wildfire-only risk scores presented in its revised R1 WMP at Table 5-5.

Since Energy Safety's Draft Decision, Liberty has engaged Filsinger to help drive advancement of the inputs and core assumptions of the risk modeling and to restructure Liberty's approach to effectiveness calculations. With this collaboration in view, Liberty proposes the following specific timeline and milestones for implementing new risk score calculations.

- Already **completed**: Liberty has engaged independent advisor Filsinger to help improve Liberty's risk modeling framework, including risk weighting and recalibration of outage risk compared to wildfire risk in that model, and held a risk-modeling workshop with Filsinger on March 4, 2026;
- By **April 2026**: Liberty will hold joint meetings and field visits with Filsinger to advance its risk modeling;
- By **June 30, 2026**: Liberty will onboard an internal Lead Risk Analyst to oversee risk modeling improvements and chair the Risk Focus Group;
- On or before **July 31, 2026**: Liberty will update Energy Safety on its risk modeling improvements and preview its 2027 WMP Update;
- On **August 31, 2026**: In its 2027 WMP Update, Liberty will provide revised 2027 and 2028 mitigation targets and updated circuit-to-mitigation mapping tables to show the status of recalibrated risk modeling;
- By **September 30, 2026**: Liberty's Risk Focus Group will assess and specifically review (documenting that review) the revised, Filsinger-informed risk model; and
- By **September 30, 2026**: Liberty will establish the revised, Filsinger-informed, risk model.

Concerning the effect of the interim wildfire-only risk scores on Liberty's mitigation activity targets, as presented in Liberty's revised R1 WMP at Table 5-5, Liberty's planned 2026 mitigation work is broadly consistent with the updated wildfire-only risk rankings. But Liberty has taken additional steps since the Draft Decision was issued to support further alignment. Of the top ten circuits under the recalibrated wildfire-only risk scoring, eight were already identified as top ten circuits for mitigation work in Liberty's 2026 mitigation scope. In response to Energy Safety's feedback, Liberty is redirecting its efforts to align with the recalibrated wildfire-only risk outputs where feasible. For example, Liberty will focus its future pole and expulsion fuse replacement efforts for the remainder of 2026 on the nineteen circuits with the highest risk based on the recalibrated wildfire-only risk calculations. To increase risk reduction based on the recalibrated scoring, Liberty is also doubling its target for expulsion fuse replacements, committing to replace 1,000 expulsion fuses (up from 500), while still aiming to replace 400 poles. Liberty will further refine its 2027 and 2028 mitigation targets and planning based on risk modeling improvements and proposes to include refined targets in its 2027 WMP Update.

With respect to capital projects including covered conductor installation, it is more challenging to fully align planned 2026 work to the recalibrated wildfire-only calculations to the extent capital has been committed, permitting is underway, and construction sequencing has begun. Liberty must balance modeling refinement with practical implementation constraints, particularly for projects already in flight. Liberty is committing to increase its 2026 covered conductor installation target from 3.9 miles to 7 miles, including work previously planned as

traditional overhead hardening and converted to covered conductor based on the recalibrated risk scores.

Moreover, Liberty's wildfire-only risk calculations support the covered conductor work already in progress for 2026, which was informed by both operational experience of Liberty's subject matter experts, as well as the wildfire risk modeling. The Muller 1296 Circuit is a significant focus of Liberty's planned covered conductor installation in 2026. This circuit is subject to high winds and has been impacted by all of Liberty's Public Safety Power Shutoffs to date. Liberty installed 1.6 miles of covered conductor on the Muller 1296 Circuit in 2025, and Liberty plans to install an additional roughly 6 miles of covered conductor on this circuit in 2026 as part of its increased target for covered conductor installation. With completion of these projects, covered conductor will comprise the mainline and lateral taps of the Muller 1296 Circuit. The wildfire-only risk calculations validate the prudence of this planned work. With the re-calculated wildfire-only risk scores, the Muller 1296 Circuit went from 1% of overall utility risk to 2% of overall fire risk. Further, as referenced above, Liberty has updated planned traditional overhead hardening to covered conductor in light of the revised wildfire-only risk scoring and risk reduction modeling.

For 2027 and 2028, Liberty will aim to more fully align its covered conductor installation efforts with the outputs of Liberty's improved risk modeling. Liberty is currently planning to install in 2027 more than 2.5 miles of covered conductor on the Meyers 3400 Circuit, which is the highest risk circuit under the revised wildfire-only risk calculations.

B. Response to RN-LU-26-02: Validation and Risk Assessment Improvement Plan

The Draft Decision concludes that because Liberty did not include reports from its internal Risk Focus Group that addressed modeling criteria or analysis of the third-party model results, it calls into question Liberty's internal validation processes and whether Liberty relied too heavily on its third-party vendors' verification of modeling outputs. Liberty did not provide reports validating its third-party model results. But Liberty's subject matter experts did review and verify risk model inputs and assess outputs against operational experience. They closely coordinated with consultants Direxyon and Technosylva during development of the Direxyon model—meeting weekly with Direxyon and bi-weekly with Technosylva, as reflected in Table 1-1 of the Revision Notice Response. Liberty, however, agrees that those processes were insufficiently formalized and documented and its validation review and risk model assessment must be better structured, documented, and consistently governed. Liberty, therefore, is taking meaningful steps to formalize and strengthen its validation framework.

To address this issue, Liberty is implementing the following corrective measures:

- Adopt a formal charter for Liberty's Risk Focus Group that defines membership, work cadence, and decision authority, by **May 29, 2026**;
- Add Liberty's President to the Risk Focus Group **by May 29, 2026**;
- Onboard a dedicated Lead Risk Analyst with primary responsibility for oversight of the risk modeling program, by **June 30, 2026**;
- Establish defined documentation requirements for Risk Focus Group meetings and model review, by **July 31, 2026**;

- Adopt a written validation protocol governing Risk Focus Group review and approval of model outputs, by **July 31, 2026**;
- Require monthly progress reports from the President of Liberty CalPeco to Algonquin Power & Utilities Corp.'s Compliance Committee and Enterprise Compliance Leader; and
- Commit to recurring annual validation and peer benchmarking.

Liberty acknowledges Energy Safety's concern that Liberty's risk assessment improvement plan did not include completion dates or key milestones that would ensure internal validation processes would be clearly documented and institutionally embedded going forward. To address this deficiency and demonstrate that Liberty's Risk Assessment Improvement Plan is complete, Liberty has, here, identified completion dates and key milestones for formalizing its Risk Focus Group and risk modeling governance framework.

The Risk Focus Group Charter will clearly define roles, authority, and escalation procedures. The written validation protocol will set forth the scope of required internal review and requisite findings to be documented for each key model input, assumption, and output before the risk model can be adopted and applied by Liberty for planning purposes. The Lead Risk Analyst will be Liberty's subject matter expert on wildfire risk modeling, chair the Risk Focus Group, and report directly to Liberty's Senior Manager, Wildfire Prevention for clear accountability for risk model development and continuous improvement. Liberty has already identified and agreed in principle to hire an industry veteran with extensive wildfire modeling experience for this role.

Liberty has committed to executing a robust and effective continuous Risk Assessment Improvement Plan for its risk modeling that appears in Table 5-6 of Liberty's WMP. That plan is detailed and further clarified below, with specified deliverables, assigned owners, and a target timeline. Liberty additionally anticipates that its Risk Assessment Improvement Plan will be refined and further improved based on Filsinger's advice on how best to advance Liberty's risk modeling in the near term.

Liberty proposes providing updates on the progress of its Risk Assessment Improvement Plan, as well as the development of internal and external validation procedures related to risk modeling, during monthly meetings with Energy Safety's Electric Safety Policy Division.

Table 2			
Liberty Utility Risk Assessment Improvement Plan			
Risk Assessment Area	**Proposed Improvement & Expected Value Add**	**Owner**	**Timeframe and Key Milestones**
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. Expected Value Add: Improved quantitative understanding of the accuracy of the risk model to help identify where our model has the highest risk of uncertainty or inaccuracies that need to be addressed in future activities.	Lead Risk Analyst	Data will be tested and reviewed by the Risk Focus Group at least annually. Processes will be established by July 31, 2026. The first review will be completed by December 31, 2026.
RA-2, Risk Assessment Methodology	Establish a process to continually test the risk modeling methodology and benchmark against peer utilities. Both quantitative and qualitative approaches to wildfire and PSPS risk assessment will be documented. Expected Value Add: Verification of modeling methodology by cross checking against peer best practices; continually improve accuracy.	Lead Risk Analyst	Methodology will be tested and reviewed at least annually by the Risk Focus Group. Processes will be established by July 31, 2026. The first review will be completed by December 31, 2026.

RA-3, Evaluate and Improve Results	Establish a formal review and feedback process with subject matter experts, third-party fire safety professionals familiar with Liberty's service area to continually test and improve the results of the risk model. This review will include presentation of risk, including dashboards and assessments, with reports from subject matter experts to the Risk Focus Group. Expected Value Add: Improve accuracy of risk score inputs and correlation of risk score calculation to known wildfire risk factors.	Lead Risk Analyst	The formal review and feedback, including the top-risk circuits list, will be completed at least annually. Processes will be established by July 31, 2026. The first review will be completed by December 31, 2026.
RA-4, Risk Event Tracking and Testing	Establish a process to track and reconstruct risk events. Lessons learned will be memorialized and integrated into planning for continual improvement. Expected Value Add: Increase practical use of risk model in planning. And improve qualitative understanding of the accuracy of the risk model.	Lead Risk Analyst	Liberty will track, reconstruct, and memorialize a minimum of three events to identify and integrate lessons learned with results reviewed by the Risk Focus Group. Processes will be established by July 31, 2026. The first three events will be reconstructed and tested by December 31, 2026.
RA-5, Use the Results to Inform Decision Making and Design Basis	Establish a cadence to present and deliver the results of Liberty's risk assessment to business planners and operators to be incorporated into Liberty's decision-making, budgeting, and design process. This review will include evaluating design-basis scenarios. Expected Value Add: Increase coordination and use of risk model outputs in project planning and budgeting to increase efficiency in risk reduction expenditure and show link to wildfire mitigation spending.	Lead Risk Analyst	The risk assessment results will be produced at least annually, so risk scores can contribute to Liberty's decision-making regarding projects and budgets. Liberty will incorporate results into WMP Updates and Base Plan submittals. Results will be included in Liberty's proposed August 2027 WMP Update, with a proposed due date of August 31, 2026.

RA-6, Establish Clear Roles and Responsibilities to Drive Improvement	Assign a dedicated resource responsible for improving and delivering risk assessment results for improved decision making. The resource will emphasize data quality, methodology, and subject matter expert and industry-tested results. Expected Value Add: Increase practical use of risk model in planning.	Lead Risk Analyst	Liberty will onboard the dedicated resource by June 30, 2026, with a clearly defined role and responsibilities. To ensure continued improvement, Liberty will finalize a documented procedure that complements the continuous improvement portion of this Risk Assessment Improvement Plan by August 30, 2026.

C. Response to RN-LU-26-03: Risk Reduction Effectiveness

Energy Safety found that Liberty's risk reduction assessment lacked maturity and contained mathematical inconsistencies. Liberty addressed and corrected these issues for its 2026–2028 Base WMP R1, as addressed in Section 1.3 of its December 4, 2025, Revision Notice Response, noting Liberty's recalculations and reconciliations. But Energy Safety's Draft Decision expressed continued concern regarding the accuracy of Liberty's risk reduction percentages and effectiveness values due to certain apparent calculation errors and the lack of explanatory documentation on calculation methodology. Liberty addresses the identified concerns below, and explains mitigation effectiveness calculations in Table 3.

- Errors Identified in Liberty's Errata Request

Liberty acknowledges that certain effectiveness values in the original 2026–2028 Base WMP contained errors, which have now been reconciled in the Errata Request filing by Liberty in December 2026. The previously reported 40.5% risk reduction value for patrol inspections, for example, was the result of a transposition data-entry error.[7] Liberty's current risk model assigns inspections a 0% direct risk reduction value and instead attributes risk reduction to follow-on corrective actions stemming from inspections. This treatment supports allocation of risk reduction to actual mitigation measures.

- Justification for Using 50% Mitigation Effectiveness Values for Certain Mitigation Strategies

Energy Safety also observed that Liberty used 50% effectiveness values for certain mitigation strategies. Those values were not arbitrary placeholders, but conservative estimates employed in the absence of territory-specific data. Peer-reviewed literature, including analysis by PG&E and UCLA, identified effectiveness values near 66% for comparable strategies related to enhanced protective settings.[8] Liberty selected a risk reduction value of 50% to remain just below the 51.6% lower confidence limit of those benchmarks and avoid overstating risk

[7] Liberty 2026–2028 Base WMP R1 Errata Request, December 18, 2025.

[8] *See, e.g.*, Gabriel San Martin Silva and Ali Mosleh, "EPSS Effectiveness Metric Enhancement," The B. John Garrick Institute for the Risk Sciences, University of California, Los Angeles (April 2024).

reduction in its smaller service territory. Liberty also selected a 50% risk reduction value for covered conductor installation in light of significant statistical variability identified by the large California utilities.[9] Given Liberty's limited dataset relative to the large utilities, this type of conservative calibration and reliance on data compiled by large California IOUs is appropriate. Nevertheless, Liberty recognizes the need for greater precision and commits to refining effectiveness values as additional data become available.

- Additional Explanation of Effectiveness Calculation Methodology

The following table reflects sources and methodologies on which Liberty based the activity effectiveness values presented in the 2026–2028 Base WMP R1. Liberty will re-evaluate these values as part of the Risk Assessment Improvement Plan described above and present an update on these values in a 2027 WMP Update that Liberty proposes to file on August 31, 2026.

Table 3

Explanation of Mitigation Effectiveness Values

Activity	Activity Effectiveness – Wildfire Risk	Activity Effectiveness - Wildfire Risk Source
Equipment Settings to Reduce Wildfire Risk	50.00%	The PG&E and UCLA study supports 50% as a conservative value for lower bound of effectiveness; Liberty will evaluate using 66% based on the study to avoid undervaluing mitigation effectiveness. Source: Gabriel San Martin Silva and Ali Mosleh, "EPSS Effectiveness Metric Enhancement," The B. John Garrick Institute for the Risk Sciences, University of California, Los Angeles (April 2024)
Expulsion Fuse Replacement	39.67%	SME-determined based on engineering; further analysis to be conducted
Distribution Pole Replacements and Reinforcements	95.00%	Based on effectiveness of a pole at end of life versus new pole and difference in likelihood of failure. Assumes pole being replaced is failing.
Open Wire/Grey Wire	78.72%	Based on reduction in failure rates from research looking at failure rates of secondary conductor based on age and material. Studies from EPRI and others.

[9] *See, e.g.,* SCE, SDG&E, and PG&E, "Joint IOU Grid Hardening Working Group Report: Update for 2026–2028 Wildfire Mitigation Plan" (March 2025) (identifying covered conductor installation risk reduction values of 67%, 60%, and 44% for PG&E, SCE, and SDG&E respectively).

Undergrounding of Electric Lines and/or Equipment	99.00%	Joint IOU Mitigation Working Group
Wood and Slash Management	50.00%	All vegetation management programs are set to 50% as conservative value; however, optimal effectiveness can be up to 67%. Liberty selected a conservative value. More study will be given to differences in vegetation activities to set unique values per initiative, as opposed to using the same effectiveness number for all vegetation management.
Quality Assurance and Quality Control	30.59%	Based on early life failure data, and showing reduction of early life failure caused by issues from construction issues by performing quality control inspections.
Covered conductor Installation	50.00%	Covered conductor studies vary widely in effectiveness in reduction in outages. SCE=60%, PG&E=67%, SDG&E=44%; Liberty's use of 50% is within the range of the larger IOUs. Source: Joint IOU Grid Hardening Working Group Report: Update for 2026–2028 Wildfire Mitigation Plan (March 19, 2025)
Clearance	50.00%	All vegetation management programs are set to 50% as conservative value; however, optimal effectiveness can be up to 67%. Liberty selected a conservative value. More study will be given to differences in vegetation activities to set unique values per initiative, as opposed to using the same effectiveness number for all vegetation management.
Fall-In Mitigation	50.00%	All vegetation management programs are set to 50% as conservative value; however, optimal effectiveness can be up to 67%. Liberty selected a conservative value. More study will be given to differences in vegetation activities to set unique values per initiative, as opposed to using the same effectiveness number for all vegetation management.

Tree Attachment Removals	78.72%	Based on reduction in failure rates from research looking at failure rates of secondary conductor based on age and material. Studies from EPRI and others.
Pole Clearing	40.50%	Probability of a spark reaching the ground and traveling beyond the clearing radius of the pole. Liberty to re-evaluate number based on distribution versus transmission level outages.

D. Response to RN-LU-26-04: Covered Conductor Effectiveness

Energy Safety identified concerns regarding Liberty's assessment of the relative ignition-risk reduction effectiveness of traditional overhead hardening and covered conductor. Liberty acknowledges that earlier iterations of Direxyon's model produced certain outputs that did not align with operational experience—for example, the relative risk-reduction effectiveness of covered conductor compared to bare wire. Those distortions reflected the evolving integration of multiple components into an increasingly sophisticated model. That integration has been further refined, and outputs are now more reliable, as Liberty discussed in its December 4, 2025 Revision Notice Response.

With respect to Energy Safety's remaining concerns, as discussed above, Liberty will work with Filsinger to refine its risk reduction effectiveness analysis and restructure its approach to mitigation effectiveness calculations. Liberty proposes to update Energy Safety on these improvements on or before July 31, 2026 and would present in its 2027 WMP Update on August 31, 2026 revised, territory-wide ignition risk reduction calculations for covered conductor, traditional overhead hardening, and undergrounding, along with refined targets and projects for 2027 and 2028 based on risk modeling improvements.

The Draft Decision refers to the comparison suggesting that traditional overhead hardening with bare conductor outperforms covered conductor as a wildfire risk reduction tool. This comparison was drawn from a discrete two-project simulation (Tahoe Vista and Stateline Resiliency), rather than a comprehensive territory-wide evaluation. Liberty's analysis of these projects appears to have inadvertently fostered this impression by attributing risk reduction to activities during the first year of installation, when failure risk associated with complex or newer technologies (such as covered conductor) can be higher than that of older, simpler technologies. In other words, in early project years, risk level assessments for covered conductor can be distorted by modeling nuances—for example, shorter span lengths (resulting in more pole attachments) and the use of newer construction methods, with which crews may have less experience, can create a higher risk of failure immediately after installation.

The effect was to overstate the relative effectiveness of traditional overhead hardening with bare wire in certain contexts. Accounting for the level of risk reduced in an asset over its full life leads to fewer distortions and a more accurate assessment of overall risk reduction for any given activity. Liberty's updated model uses the lifetime risk level for each asset to calculate the total risk reduction of each mitigation activity during the period of Base WMP implementation, from its first day to the last. This updated model confirms that covered

conductor provides a greater reduction in wildfire ignition risk than traditional overhead hardening. Importantly, the recalibrated wildfire-only model aligns with operational experience and broader utility practices in confirming that covered conductor is generally an effective wildfire mitigation strategy, and Liberty continues to install covered conductor.

That said, the considerations associated with risk reduction from covered conductor versus traditional overhead hardening are nuanced. Liberty recognizes, for example, that in certain low-tree-density environments, traditional overhead hardening with wider cross-arms and shortened spans may achieve comparable risk reduction at lower cost. Liberty remains committed to participating in the joint utility working groups to continue to evaluate this and other issues.

E. Response to RN-LU-26-05: Cost-Benefit Analysis for the Stateline Resiliency Project

Energy Safety flags concerns that Liberty's cost-effectiveness framework for wildfire mitigation is unclear and potentially inconsistent with the WMP Guidelines. Liberty has clarified and corrected its methodology. Liberty will use a Risk Spend Efficiency ("RSE") metric for wildfire mitigation prioritization, consistent with the WMP Guidelines. The RSE formula applied is:

RSE = (Pre-Mitigation Risk Score – Post-Mitigation Risk Score) ÷ Cost.

In prior filings, Liberty described its metric as "effectiveness divided by cost." While conceptually related to RSE, Liberty's calculations did not track the specified RSE formula. As part of its risk modeling improvements, Liberty will work with Filsinger to restructure its approach to effectiveness calculations to support presentation of RSE values for wildfire mitigation projects using this specified formula and consistent with Energy Safety's expectations. Liberty will present updated tables in its 2027 WMP Update. Recalculated values will reflect explicit application of the RSE framework and eliminate any ambiguity in methodology.

With respect to the Stateline Resiliency Project, that particular potential project pre-dated Liberty's risk modeling. Liberty had previously identified the project as supporting a major commercial load center with a community grocery store, which has since closed. Based on those changed circumstances, as well as Liberty's developing risk modeling and subject matter expert input, Liberty has prioritized other work and Liberty's 2026–2028 Base WMP does not identify planned undergrounding work. As described in more detail above, Liberty will present refined targets and projects based on its improved risk modeling and restructured effectiveness calculations on or before July 31, 2026, to be included in Liberty's 2027 WMP Update.

Moving forward, Liberty will apply RSE consistently for WMP project prioritization and capital planning to align spending with risk modeling outputs. Liberty stands ready to align with any additional clarification Energy Safety may provide regarding cost-effectiveness metrics for small and multi-jurisdictional utilities in the WMP context.

IV. LIBERTY'S WORK IN 2026 WILL MATERIALLY REDUCE WILDFIRE RISK

While working to advance its risk modeling framework, Liberty continues to implement wildfire mitigation projects that reduce wildfire ignition risk and enhance system resiliency and public safety. These efforts are centered around proven grid hardening techniques.

In 2026, Liberty will execute multiple mitigation projects across its service territory, including covered conductor installation, pole replacements, expulsion fuse replacements, vegetation management, and targeted hardening of high-risk circuits. Liberty installed approximately 3.53 miles of covered conductor in 2025 and will continue to prioritize covered conductor installation as a wildfire risk reduction measure in 2026. Liberty has increased its covered conductor installation target from 3.9 miles to 7 miles for 2026—an increase of 79 percent over its original covered conductor target. Liberty is also now targeting 1,000 expulsion fuse replacements—largely prioritizing them to the higher risk circuits identified by Liberty's recalibrated, interim wildfire-only risk calculations. Liberty also updated plans for traditional overhead hardening to install covered conductor instead, based on updated wildfire-only risk scoring. These projects will meaningfully reduce wildfire ignition risk independent of ongoing modeling refinement.

Performance data verifies the efficacy of the mitigation approaches Liberty will employ in 2026. Since acquiring the utility in 2011, Liberty has experienced only one large ignition event attributed to electrical infrastructure—the 2020 Mountain View Fire. The circuit involved in that ignition has now been upgraded, including a significant portion with covered conductor. Liberty also operates a robust vegetation management program that effectively partners with the U.S. Forest Service. Energy Safety's recent audit of Liberty's vegetation management program found completion of all thirteen initiatives identified in the 2023–2025 WMP. Further, System Average Interruption Duration Index ("SAIDI") and System Average Interruption Frequency Index ("SAIFI") metrics have both steadily improved as Liberty's hardening efforts advanced. Between 2021 and 2025, Liberty achieved a 41% reduction in SAIDI and a 36% reduction in SAIFI. Collectively, these metrics show Liberty making measurable progress in reducing events that could lead to ignition. Liberty has appropriately prioritized mitigation projects while continuing to mature its risk modeling capabilities. Liberty will continue and accelerate that progress in 2026 based on its commitment to risk modeling improvements.

V. REQUEST FOR CONDITIONAL APPROVAL OF LIBERTY'S 2026–2028 BASE WMP

Liberty respectfully requests that Energy Safety grant conditional approval of Liberty's 2026–2028 Base WMP R1.[10] Energy Safety has consistently issued conditional approvals where utilities have demonstrated good-faith progress and concrete corrective commitments.

[10] Alternatively, Energy Safety could issue a Second Revision Notice authorizing Liberty to submit within 30 days a further revised (R2) version of its 2026–2028 Base WMP incorporating the further commitments and conditions described herein such that Energy Safety could issue a final decision on that updated version of Liberty's WMP.

Conditional approval would ensure oversight and accountability while maintaining a constructive path for continued maturation of Liberty's risk modeling program.

Liberty has acknowledged its shortcomings, engaged Filsinger to achieve risk modeling advancement in the near term, committed to formalize and improve governance and validation processes, and identified concrete milestones. Liberty also continues to execute meaningful wildfire mitigation in the field. For small utilities like Liberty that have limited in-house resources and data sets given their smaller systems, keeping pace with the evolving risk framework presents unique implementation challenges.[11] By engaging Filsinger, Liberty has demonstrated its commitment to drive further improvements targeting a best-in-class approach to wildfire risk modeling. Liberty further comments that Energy Safety's facilitation of continued data sharing and further collaboration on mitigation effectiveness calibration would materially benefit smaller utilities and enhance statewide consistency.

Liberty proposes an approval conditioned on a structured set of enforceable commitments and requirements, as set forth in the Appendix. Liberty proposes to file on August 31, 2026, a 2027 WMP Update demonstrating Liberty's progress in executing on the commitments and risk modeling improvements described herein to address Energy Safety's continuing concerns. Liberty will also meet with Energy Safety on or before July 31, 2026, to preview the 2027 WMP Update and present improvements to Liberty's risk modeling. Liberty further recommends monthly meetings with Energy Safety's Electric Safety Policy Division to provide ongoing updates regarding Liberty's progress as it works toward the 2027 WMP Update milestone.

Liberty respectfully submits that denial of Liberty's 2026–2028 Base WMP would be counterproductive to Liberty and Energy Safety's shared goal of minimizing catastrophic wildfire risk. As recognized by Energy Safety's Director, approved WMPs drive accountability and encourage continued incremental improvements over previously approved mitigation plans. As described herein, the Draft Decision has already driven concrete improvements that will materially strengthen Liberty's wildfire mitigation program and enhance public safety. Denial would not further advance these outcomes and would instead undermine the WMP framework by penalizing Liberty for undertaking an ambitious approach to risk modeling in spite of its small size. Liberty has demonstrated its commitment to taking reasonable and appropriate steps to mitigate wildfire risk, and a denial would make Liberty an outlier as compared to its peers, unnecessarily increasing risk and costs for Liberty and its customers as we approach fire season.

Liberty appreciates the opportunity to submit these comments and looks forward to close collaboration with Energy Safety on continuing to advance Liberty's risk modeling and wildfire mitigation efforts to enhance the safety of Californians.

[11] Liberty looks forward to further engagement on this issue with Energy Safety and other stakeholders at the April 15, 2026 Risk Modeling Working Group ("RMWG") meeting focused on potential improvements to the WMP guidelines related to risk modeling.

APPENDIX OF ADDITIONAL REMEDIES AND COMMITMENTS TO LIBERTY'S 2026–2028 BASE WMP R1

Issue	Section	Correction or Change
RN-LU-26-01	Section 5.5.2	Revise Table 5-5 with updated wildfire-only circuit rankings.
RN-LU-26-01	Section 6.1.2	Liberty has engaged independent advisor Filsinger to help improve Liberty's risk modeling framework, including risk weighting and recalibration of outage risk compared to wildfire risk in that model.
RN-LU-26-01	Section 6.1.2	Liberty's plan to incorporate recalibrated wildfire-only risk calculations into its 2027 and 2028 mitigation targets.
RN-LU-26-01	Section 6.1.2	Liberty will revise its 2027 and 2028 mitigation targets and updated circuit-to-mitigation mapping tables, to show the recalibrated model aligns with its mitigation portfolio.
RN-LU-26-01	Section 6.1.2	Explain how Liberty is and is not revising its 2026 mitigation scope or targets based on the recalibrated wildfire-only model calculations.
RN-LU-26-01	Section 6.1.2	Explain that recalibrated wildfire-only model calculations support mitigation work that Liberty has in progress for 2026, which was informed by the operational experience of Liberty's subject matter experts, as well as wildfire risk modeling.
RN-LU-26-01	Section 8.1	Revise covered conductor installation 2026 target in Table 8-1 from 3.9 miles to 7 miles.
RN-LU-26-01	Section 8.1	Revise expulsion fuse replacement 2026 target in Table 8-1 from 500 fuses to 1,000 fuses.
RN-LU-26-01	Section 8.1	Revise the covered conductor installation, expulsion fuse replacement, and pole replacements and reinforcement 2027 and 2028 targets in light of 2026 target updates.
RN-LU-26-01	Section 8.1.	Update Table 8-1 to reflect new covered conductor work, including work that will replace previously planned traditional overhead hardening.
RN-LU-26-01	Section 6.2.1.3	Future pole replacements and expulsion fuse replacements for the remainder of 2026 will focus on 19 circuits with highest recalibrated wildfire-only risk scores.

RN-LU-26-01	Section 6.1.2; Section 8.2.1	Mitigation work for 2026 includes, for example, that Liberty installed 1.6 miles of covered conductor on the Muller 1296 Circuit in 2025, and plans to install an additional roughly 6 miles of covered conductor on this circuit in 2026.
RN-LU-26-02	Section 5.6.1	Liberty plans to adopt a formal charter for Liberty's Risk Focus Group that defines membership, work cadence, and decision authority by May 29, 2026.
RN-LU-26-02	Section 5.6.1	Liberty CalPeco's President will be on the Risk Focus Group to ensure executive-level engagement with risk modeling.
RN-LU-26-02	Section 5.6.1	Liberty plans to adopt a written validation protocol governing Risk Focus Group review and approval of model outputs by July 31, 2026.
RN-LU-26-02	Section 5.6.1	Liberty's Risk Focus Group will assess, specifically review (documenting that review), and establish the revised, Filsinger-informed risk model by September 30, 2026.
RN-LU-26-02	Section 5.6.1	Liberty commits to hire a dedicated Lead Risk Analyst with primary responsibility for oversight of the risk modeling program by June 30, 2026.
RN-LU-26-02	Section 5.6.1	Describe the Lead Risk Analyst's responsibility and position within the organizational structure.
RN-LU-26-02	Section 5.6.1	Liberty commits to recurring annual validation and peer benchmarking.
RN-LU-26-02	Section 5.6.1	Liberty's independent review processes will be better structured, documented, and consistently governed.
RN-LU-26-02	Section 5.6.1	Liberty CalPeco's President will submit monthly progress updates on risk modeling to Algonquin Power & Utilities Corp.'s Compliance Committee and Enterprise Compliance Leader.
RN-LU-26-02	Section 5.6.1	Liberty will provide monthly progress updates to Energy Safety on Liberty's risk modeling and Risk Assessment Improvement Plan.
RN-LU-26-02	Section 5.6.1	Liberty commits to meet monthly with Energy Safety's Electric Safety Policy Division to provide updates on its Risk Assessment Improvement Plan and further modeling refinement.

RN-LU-26-02	Section 5.6.1	Liberty is planning to develop a new validation process seeking to engage local fire agencies and other public safety partners to review and validate the outputs of Liberty's wildfire risk modeling through joint field visits and information sharing. Liberty will initiate this process by May 29, 2026.
RN-LU-26-02	Section 5	Liberty has engaged Filsinger as an independent advisor to drive continued improvement of Liberty's risk modeling and wildfire mitigation program.
RN-LU-26-02	Section 5	Liberty commits to document progress under the Risk Assessment Improvement Plan by July 31, 2026.
RN-LU-26-02	Section 5.7	Revise Table 5-6 and narrative of the Risk Assessment Improvement Plan items RA-1 through RA-6, as described in Table 2, to include milestones of the enhancements Liberty will undertake to improve its risk modeling and wildfire mitigation program.
RN-LU-26-03	Section 6.2.1.3	Update Table 6-4 to reflect corrected risk scores and reduction levels based on revised targets.
RN-LU-26-03	Section 6.2.1.1	Update Figure 6-2 to reflect service territory wildfire risk and reduction based on revised targets.
RN-LU-26-03	Section 8.1	Update Table 8-1 to reflect risk and reduction based on revised targets.
RN-LU-26-03	Section 9.1.2	Update Table 9-1 to reflect risk and reduction based on revised targets.
RN-LU-26-03	Section 9.1.2	Update Table 9-2 to reflect risk and reduction based on revised targets.
RN-LU-26-03	Section 10.1.2	Update Table 10-1 to reflect risk and reduction based on revised targets.
RN-LU-26-03	Section 6.2.1.2	The 50% effectiveness values for certain mitigation strategies are conservative estimates employed in the absence of territory-specific data based on peer-reviewed literature.
RN-LU-26-03	Section 6.2.1.2	Explain the effectiveness values displayed in Table 3.
RN-LU-26-03	Section 6.2.1.2	Liberty commits to refining effectiveness values as additional data become available.
RN-LU-26-04	Section 6.2.1; Section 8.2.1	Revise the territory-wide ignition risk reduction calculations for covered conductor (with and without Sensitive Relay Profiles) in the narrative and Table 6-3.

RN-LU-26-04	Section 6.2.1; Section 8.2.5	Revise the territory-wide ignition risk reduction calculations for traditional overhead hardening (with and without Sensitive Relay Profiles) in the narrative and Table 6-3.
RN-LU-26-04	Section 6.2.1; Section 8.2.2	Revise the territory-wide ignition risk reduction calculations for undergrounding (with and without Sensitive Relay Profiles) in the narrative and Table 6-3.
RN-LU-26-04	Appendix D, LU-23B-06	Revise Table 1-2 to include risk reduction percentages based on the recalibrated wildfire-only risk model.
RN-LU-26-04	Appendix D, LU-23B-06	Provide analysis distinguishing between forested and non-forested deployment contexts.
RN-LU-26-04	Appendix D, LU-23B-06	Revise Table 1-2 and the narrative suggesting that traditional overhead hardening with bare conductor outperforms covered conductor as a wildfire risk reduction tool and explaining that Liberty has completed a corrected territory-wide lifecycle analysis demonstrating the relative effectiveness of traditional overhead hardening, covered conductor, and undergrounding mitigation alternatives.
RN-LU-26-05	Appendix D, LU-25U-04	Revise the narrative to explain that Liberty's cost-effectiveness framework for wildfire mitigation uses an RSE metric based on the formula required by WMP Guidelines.
RN-LU-26-05	Appendix D, LU-25U-04	Explain that Liberty is recalculating RSE values for wildfire mitigation projects using this specified formula.
RN-LU-26-05	Appendix D, LU-25U-04	Provide corrected RSE values for Stateline Resiliency, Tahoe Vista, and contemplated undergrounding projects, if any.