

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

OEIS Docket: 2025 Wildfire Mitigation Plan  
Annual Implementation Report

Docket #2025 EC AIR

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC'S (U 933-E) 2025 WILDFIRE  
MITIGATION PLAN ANNUAL IMPLEMENTATION REPORT**

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Pursuant to Cal. Pub. Util. Code § 8386 and the Office of Energy Infrastructure Safety (“OEIS”) Resolution M-4860, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby files this Annual Implementation Report (“AIR”) regarding Liberty’s 2025 Wildfire Mitigation Plan (“2025 WMP”). This AIR follows the guidance in Section 6 of the Office of Energy Infrastructure Safety (“OEIS” or “Energy Safety”) Performance Guidelines issued in December 2025.

**I. LIBERTY’S ASSESSMENT OF PROGRESS TOWARD MEETING WMP OBJECTIVES  
AND TARGETS IN 2025**

**A. Liberty’s description of progress toward achieving the summarized objectives for  
the three- and 10-year WMP plan cycles, as identified in Section 4.2 of Liberty’s  
2023-2025 WMP.**

In accordance with Cal. Pub. Util. Code § 8386(a), Liberty constructs, maintains, and operates its electric system in a manner that minimizes the risk of catastrophic wildfire posed by its electric power lines and equipment. Liberty’s overarching WMP goal is to prevent and mitigate the risk of wildfires caused by utility equipment. In 2025, Liberty continued to identify ways to enhance its wildfire prevention and mitigation efforts. Liberty’s overall progress in 2025 implementing its WMP met the risk reduction intent of its 2025 WMP to reduce ignition probabilities and minimize the societal

consequences (with specific consideration to the impact on Access and Functional Needs (“AFN”) populations and marginalized communities) of both wildfires and the mitigations employed to reduce them, including Public Safety Power Shutoff (“PSPS”) events.

In 2025, Liberty made significant progress achieving its WMP objectives summarized in Section 4.2 of its 2023-2025 Base WMP and Section 2.1 of its 2025 WMP Update. Refer to Table 1 below.

**Table 1: Progress Toward Achieving 2023-2025 WMP Section 4.2 Summarized Objectives**

| WMP Category   | Summarized Objective in 2023-2025 WMP  | Description of Liberty's Progress Toward Achieving Objective   |
|--|--|--|
| Risk Analysis  | Develop circuit segment wildfire and PSPS risk scores that factor in weighted asset risk of failure with vegetation contact risk to plan for effective mix of mitigations.   | Liberty updated its circuit segment wildfire scores and began development of PSPS risk scores.   |
|  | Develop baseline risk scores at the circuit level and at the overall system level.   | Liberty has updated wildfire risk scores for each circuit. PSPS scoring is in development and will be integrated into circuit risk scoring.  |
|  | Improve risk-based decision-making framework using risk models and analyses (e.g., Technosylva Wildfire Risk Reduction Model (“WRRM”), pole risk and investment optimization models and process flow charts, wildfire and PSPS consequence models with social vulnerabilities factored, weather analytics for situational awareness and mitigation planning).  | During 2025 Liberty focused on enhancements to PSPS Risk, SRP Risk, Outage Modeling, and Secondary Conductor Risks. Liberty also rolled out probabilistic quantitative scores for Mitigation Initiatives.  |
| Grid Hardening   | Continue compliance-based pole replacements and repairs and target new locations based on Technosylva’s WRRM analyses.   | Liberty completed 4,942 compliance-based pole replacements and repairs in 2025 that were identified through its asset inspection process and eliminated its backlog of past due repairs. Liberty is using circuit wildfire risk scores to prioritize new pole replacements and repairs for 2026.   |
|  | Evaluate the appropriate mitigations for the highest wildfire risk areas in Liberty’s service territory. The evaluation process and risk assessment will consider:<br>- The percentage of Liberty’s system that is newly rebuilt, including the number of poles and line miles replaced since 2019 (i.e., covered conductor projects, G.O. 165 survey repairs and replacements, fire-damage replacements, distribution line rebuilds).<br>- The number of equipment repairs on overhead (“OH”) poles since 2019 (i.e., OH service failures, storms, G.O. 165 repairs).<br>- Substation upgrades and rebuilds. Liberty has replaced oil-filled circuit breakers and wooden substructures and has improved its defensible vegetation clearance around substations. | Liberty completed a data refresh of grid hardening initiatives that are incorporated into Liberty's risk model. Inputs to the model include vegetation management, pole replacements, fuse replacements, overhead conductors, outage data, work orders, and maintenance history. Additional data for secondary conductors and tree attachments were added to the risk model in 2025.   |
| Vegetation Management  | Maintain current VM program.   | Liberty maintained its planned vegetation management operations throughout 2025 including all planned inspection protocols, VM maintenance work, and program management approaches.  |
|  | Complete effectiveness of enhanced clearances study.   | In 2025 Liberty conducted an annual analysis of vegetation clearances to conductors using LiDAR data from 2021-2024. The analysis showed that the overall average distance between vegetation and conductors continues to increase across vegetation management regions. Liberty also observed a continued downward trend in the number of vegetation encroachments within each grow-in zone based on annual LiDAR change analysis.  |
|  | Complete vegetation risk modeling.   | Vegetation management has been incorporated into Liberty's risk model. The vegetation management inputs include historical tree inventories, LiDAR data, and maintenance history to identify risk reduction.   |
|  | Complete fall-in risk scoring model pilot.   | Liberty conducted an analysis of a fall-in risk scoring model derived through LiDAR inspections in 2023 and concluded the assessment in December of 2023.  |
|  | Implement Integrated Vegetation Management (“IVM”) monitoring program.   | Liberty has implemented its IVM monitoring program by establishing monitoring plots on sections of its distribution and transmission lines.  |
|  | Develop utility arborist training program for Liberty’s service area   | Liberty completed three additional online training modules for arborists in 2025, building off the first three training modules released in 2024.  |
| Situational Awareness  | Determine weather station network capacity.  | All planned weather stations have been installed, and no new weather stations have been determined to be necessary.  |
|  | Implement maintenance program for weather stations.  | Liberty implemented a maintenance program for weather stations in 2024. In 2025 this program involved the calibration of all 39 Liberty Weather Stations. In addition to performing standard calibration procedures, the field teams addressed a variety of site-specific operational tasks. These included:<br><ul style="list-style-type: none"> <li>• Troubleshooting and resolving sensor and communication issues</li> <li>• Implementing wiring modifications required for program updates</li> <li>• Replacing or installing fuel sticks and other equipment</li> <li>• Performing power system checks and maintenance</li> <li>• Firmware, template, program, OS updates for the modems and dataloggers</li> </ul> |
|  | Research emerging technologies for future fault detection pilot programs.  | The University of Nevada Reno (“UNR”) completed a Fire Mitigation Protection System Study for Liberty that looked at High Impedance Fault Detection (“HIFD”). The study recommended that Liberty should pursue a fast trip or SRP scheme to reduce fire risk. Liberty implemented its SRP Program in 2024 and 2025. As a part of ACI LU-25U-08, Liberty committed to performing another study re-evaluating its use of High Impedance Fault Detection in 2026.   |
| Work with AlertWildfire to own and operate cameras to track smoke and fires. | In 2025, Liberty executed an agreement with the University of Nevada Reno (UNR) to adopt the existing ALERT Tahoe camera network, adding 16 sites to its portfolio of wildfire camera locations. The cameras are owned and operated by UNR and operations and maintenance costs are sponsored by Liberty.  |  |

| WMP Category   | Summarized Objective in 2023-2025 WMP  | Description of Liberty's Progress Toward Achieving Objective  |
|--|--|---|
|  | <p>Implement new technologies if available (i.e., AI smoke detection) to identify ignitions more quickly.</p> <p>Improve weather forecasting capabilities as models improve or additional data becomes available.</p>  | <p>In 2025, Liberty executed an agreement with the University of Nevada Reno to adopt the existing ALERT Tahoe camera network, adding 16 sites to its portfolio of wildfire camera locations. These cameras provide AI early detection alerts from the ALERTWest/ALERTCalifornia Websites, which are used by fire suppression agencies to notify them of ignitions more quickly than traditional means.</p> <p>Liberty worked with its weather and fire science consultants to maintain its situational awareness and weather forecasting capabilities.</p>   |
| <p><b>Emergency Management and Stakeholder Collaboration</b></p>                             | <p>Update workforce training on incident Command System (“ICS”).</p>   | <p>All Incident Management Team members have received training through Liberty Utilities Learning Management System (LMS). LMS module addresses Incident Command response and is based on the FEMA ICS 100 and ICS 200 courses. Training participation is assigned and tracked through the LMS system. Initiative was completed for the 2023-2025 WMP cycle. As Liberty adds new members to its Incident Management Team, those individuals receive training in ICS 100, 200, 700, and 800 through Liberty’s Learning Management System (LMS). The LMS leverages the FEMA training website for both instruction and certification, ensuring members are up to speed.</p>  |
|  | <p>Maintain Emergency Response Plans.</p>  | <p>Emergency Management maintains an All Hazards Emergency Response Plan. The main plan details emergency response procedures and separate annexes or play books address, Wildfire, Winter Storms, and Public Safety Power Shutoffs. Liberty’s PSPS Playbook was updated on January 24, 2025, April 11, 2025, and June 23, 2025. Liberty’s CEMP was updated on May 6, 2025.</p>   |
|  | <p>Engage with local stakeholders to prepare for and respond to fire-related events.</p>   | <p>Liberty engages with local stake holders to prepare for and respond to fire related events. In 2025, Liberty engaged with local stakeholders through multiple fire-related preparedness activities, including participation in community wildfire safety fairs and outreach events. . In 2025, Liberty also engaged public safety partners through its PSPS tabletop and functional exercises, which included participation from Cal Fire, Cal OES, CPUC, local governments, and other public safety agencies. AFN focused stakeholders are engaged throughout the year and invited to participate in Liberty’s preparedness exercises. Additionally, Liberty hosts a targeted CBO webinar to present PSPS and wildfire preparedness information specifically to local organizations and agencies. Additionally, Liberty participates as a Collaborating Member of the Tahoe Fire and Fuels Team. The TFFT is a multi-agency coalition that focuses on coordinated wildfire prevention work in the Lake Tahoe Basin, including fuels reduction, community preparedness, public outreach, and interagency planning.</p> |
|  | <p>Enhance documentation and use of lessons learned to update plans.</p>   | <p>Individual Emergency Response Plan annexes are increased in granularity through Liberty’s Lessons Learned Program. Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are subsequently updated to reflect lessons learned and increase granularity. In 2025, AARs were recorded for one PSPS event, winter storms, and a Community Resource Center specific AAR session after Liberty’s PSPS activation on November 5, 2025.</p>  |
|  | <p>Increase granularity and customization of response plans.</p>   | <p>Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are subsequently updated to reflect lessons learned and increase granularity of the plans. In 2025, this included updates to PSPS playbook elements such as refining Incident Command role definitions and incorporating additional operational departments.</p>   |
|  | <p>Implement planned communication channels and technologies with customers, community, and stakeholders.</p>  | <p>Planned communications channels and technologies have been implemented with customers, the community and stakeholders. Liberty’s EOC structure includes liaison communication with key stakeholders, Community Based Organizations, Public Safety Partners, and OES partners. Liberty uses the Onsolve platform to communicate with its customers via text, phone call, and email during outages and before, during, and after PSPS events. Liberty’s wildfire mitigation efforts and PSPS education are shared in our customer communications channels: emails, social media, direct mail, and website throughout the year. In addition, Liberty purchases digital ads May-October geo-targeting our customers. Liberty purchases print ads and radio May-October, and participates throughout the year in community outreach efforts as well.</p>  |
|  | <p>Collaborate with CBO networks to support, educate, notify, and prepare AFN communities.</p>   | <p>In 2025, Liberty utilized its connections to local organizations by participating in community events and holding presentations in collaboration with CBOs. These events were valuable opportunities to educate and prepare AFN communities across Liberty’s service territory regarding PSPS Preparedness, customer assistance programs, and AFN self-identification. Events and outreach included Liberty participation in community events, Liberty hosted Open Houses through collaboration with local partners throughout the service territory, senior center presentations, collaborative events organized with LIHEAP administrators, and outreach conducted at multifamily housing locations. Liberty also collaborates with senior nutrition programs to administer shelf stable meal boxes filled with food items, water, PSPS and wildfire preparedness information, and customer assistance program information including AFN self-ID. This outreach approach focuses on reaching vulnerable populations through leveraging trusted and established networks.</p>   |
|  | <p>Collaborate with public safety partners to support, educate, notify, and prepare AFN communities.</p>   | <p>Liberty worked collaboratively in 2025 with Public Safety Partners across the service territory through inclusion in preparedness planning, presentations, community outreach, and direct communications. Liberty participated in local wildfire preparedness events and organized a Community Resource Center demonstration on site through collaboration with their CRC contractor, FireDawg. Additionally, Liberty participates as a Collaborating Member of the Tahoe Fire and Fuels Team. The TFFT is a multi-agency coalition that focuses on coordinated wildfire prevention work in the Lake Tahoe Basin, including fuels reduction, community preparedness, public outreach, and interagency planning.</p>  |
| <p>Support bilingual outreach through the utilization of bilingual outreach coordinator.</p> | <p>Liberty employs a bilingual Outreach Specialist as part of the Community Outreach Team. This position provides outreach to the Spanish speaking population in Liberty’s service territory. The responsibilities of the position include assisting Spanish Speaking customers fill out applications for Liberty community assistance programs and providing Spanish language support at outreach events and presentations.</p> |   |

| WMP Category | Summarized Objective in 2023-2025 WMP  | Description of Liberty's Progress Toward Achieving Objective   |
|--------------|--|--|
|              | Identify improvements to overall accessibility of information available to AFN customers.  | In 2025, Liberty spread preparedness information via direct mailing to all identified AFN customers and provided preparedness information to vulnerable senior populations through a shelf-stable meal box effort. CBO feedback has informed Liberty of the value of paper materials in reaching senior populations, and each meal box contained materials related to PSPS and wildfire preparedness information and customer assistance program information including AFN self-ID. Collaborative outreach with CBOs allows Liberty to consider how to target AFN categories when providing this information, and results obtained from Liberty's biannual Wildfire Awareness Survey provides valuable insight regarding communication approach. Liberty revised direct mail content related to PSPS and wildfire preparedness reaching AFN communities with simplified language and format improvements in 2025. Additionally, field audits were performed on all Medical Baseline customer households providing door hangers describing PSPS notification pre-season. Phone calls were placed to confirm Medical Baseline customer contact information utilizing a simplified script describing Public Safety Power Shutoff processes and notification information. Liberty also revised their AFN self-ID web form and paper forms to simplify self-identification in 2025. |
|              | Encourage self-identification of AFN customers through targeted outreach and communications.   | In 2025 Liberty advertised AFN self-ID forms through local organizations, outreach events, Community Resource centers, Liberty's website, the assistance program enrollment process, and ad campaigns.   |
|              | Hold regular PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy.   | Liberty conducts regular PSPS meetings with Tahoe Donner PUD and NV Energy. Meetings are conducted every 1-2 weeks during fire season and every 2-4 weeks throughout the remainder of the year. These meetings provide an opportunity for Liberty to collaborate with NVE and TDPUD with a focus on situational awareness, emergency management, and fire mitigation.  |
|              | Communicate effectively with stakeholders through tailored approaches for outreach, engagement, and information exchange with customers, communities, and stakeholders based on various groups' unique needs. Identify emerging channels and technologies to better communicate with customers, community, and stakeholders. | Liberty provides tailored approaches for outreach, engagement and information exchange with stakeholders through a variety of methods based on unique needs. Liberty utilizes multiple communication channels including in-person events and presentations, virtual events and presentations, social media, direct mail, email, and targeted outreach through community-based organization and agency collaboration to reach stakeholders throughout the service territory. Liberty developed targeted virtual CBO and agency facing meetings to share information throughout the year including focused topics including PSPS and wildfire awareness, customer assistance programs, and other relevant updates for the community. These meetings provide an opportunity to engage with CBOs throughout Liberty's service territory while providing information applicable to populations served through trusted and established networks.   |

**B. Liberty’s description of progress toward achieving the three- and ten-year detailed objectives listed in the tables in Section 8 of Liberty’s 2023-2025 WMP.**

Liberty made significant progress achieving its three- and 10-year objectives detailed in Section 8 of its 2023-2025 WMP. Refer to Table 2 below.

**Table 2: Progress Toward Achieving 2023-2025 WMP Section 8 Detailed Objectives**

| WMP Category                            | WMP Objective   | 3 or 10-year Objective | WMP Initiatives and Tracking IDs          | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2025  |
|---|---|------------------------|---|------------------------------|--|---|
| Grid Design, Operations and Maintenance | Build out a Sensitive Relay Profile (“SRP”) program throughout Liberty’s system to reduce ignition risk. Install additional reclosers to help with sectionalization. Install additional fault indicators to help with reliability | 3                      | WMP-GDOM-GO-01; WMP-GDOM-GH-08; WMP-SA-02 | Section 8.1.2, pp. 153-170   | 12/31/2025                             | Liberty implemented SRP on 16 additional circuits in 2025, exceeding its 2025 WMP target. Liberty installed six automatic reclosers in 2025, including four targeted automatic reclosers from 2025 and two targeted reclosers from 2024. Throughout the 2023-2025 WMP cycle, Liberty completed SRP implementation on 31 circuits and installed fault indicators and automatic reclosers to support program implementation. All current reclosers that are set up as such have had SRP settings installed at this time. Liberty will continue reviewing one-third of the circuits every year to ensure settings remain appropriate and look for opportunities to improve.  |
|   | Continue to install covered conductor in high fire risk areas at a reduced rate while we gather better data on the risk spend efficiency of this program.   | 3                      | WMP-GDOM-GH-01                            | Section 8.1.2, pp. 153-170   | Ongoing                                | Liberty installed 3.53 miles of covered conductor in 2025, exceeding its 2025 WMP target of 2.68 miles. Liberty’s 2025 covered conductor projects were completed on Liberty top-risk circuits (as identified in Liberty’s 2023-2025 Base WMP, its 2025 WMP Update, and its 2026-2028 Base WMP_R1), including 1.93 miles on its MEY3400 circuit and 1.6 miles on its MULLER1295 circuit. Throughout the 2023-2025 WMP cycle, Liberty met 94% of its target for covered conductor mileage (13.1 miles completed of 14 miles targeted). In 2025, Liberty updated its risk model to allow improved analysis of covered conductor projects, which resulted in an increase to the covered conductor target for 2026.  |
|   | Continue to underground conductor in high fire risk areas where economically feasible. Undergrounding is considered as an alternative for any future project.   | 3                      | WMP-GDOM-GH-02                            | Section 8.1.2, pp. 153-170   | Ongoing                                | Liberty completed 0.3 miles of undergrounding in 2025, slightly under its 2025 WMP target of 0.4 miles. Liberty completed the Cave Rock undergrounding project in 2025. Based on Liberty’s wildfire risk modeling, the completed Cave Rock undergrounding project provides greater modeled wildfire risk reduction than the originally planned Tahoe Vista Rule 20 project. The Tahoe Vista project was a Rule 20 undergrounding initiative, which is not selected based on wildfire risk reduction criteria, whereas the Cave Rock project was prioritized based on both constructability and expected wildfire risk reduction outcome. Although Liberty did not meet its undergrounding targets throughout the 2023-2025 WMP cycle, Liberty did meet the intended risk reduction for this WMP initiative. |
|   | Replace or repair poles in territory that have been deemed necessary by our system surveys.   | 3                      | WMP-GDOM-GH-03                            | Section 8.1.2, pp. 153-170   | Ongoing                                | Liberty completed 1,038 pole replacements in 2025, exceeding its 2025 WMP target of 400 pole replacements. Of the 1,038 pole replacements completed in 2025, 728 poles were replaced as part of Liberty’s Resiliency Program, 77 poles were replaced as part of covered conductor projects, 14 as storm replacement projects, and the remaining poles were new poles installed either as new pole sets or new business.   |
|   | Continue to rebuild or repair high priority overhead conductor in territory to address aging infrastructure and help with reliability and wildfire mitigation.  | 3                      | WMP-GDOM-GH-05                            | Section 8.1.2.5, pp. 162-163 | Ongoing                                | Liberty did not target or complete any traditional overhead hardening in 2025. Throughout the 2023-2025 WMP cycle, Liberty exceeded its target for traditional overhead hardening mileage by 169% (12.7 miles completed of 7.5 miles targeted).   |
|   | Pilot the resonant grounding or “Swedish neutral” system on one substation within three years, test its risk spend efficiency and effectiveness.  | 3                      | WMP-GDOM-GH-06                            | Section 8.1.2, pp. 153-170   | TBD                                    | In Liberty’s 2025 WMP Update, Liberty explained that the objective completion date for piloting the Swedish neutral technology was delayed to assess future cost and resource needs. Liberty is evaluating designing its substation rebuilds with provisions to potentially install Swedish neutral systems where possible if Liberty chooses to pursue this technology.  |
|   | Continue to consider microgrids, and line removal as an alternative solution to help with wildfire mitigation. Currently planning to bring a new microgrid online along with line removal in 2024.                                | 3                      | WMP-GDOM-GH-07; WMP-GDOM-GH-09            | Section 8.1.2, pp. 153-170   | Ongoing                                | Liberty did not target or complete a microgrid and associated line removal in 2025. Throughout the 2023-2025 WMP cycle, Liberty did not complete a microgrid and associated line removal. Liberty considered a microgrid project in 2024, however upon further assessment, the expected size, costs, and lead times for the microgrid were higher than anticipated and Liberty replaced the project with a covered conductor project completed in 2024.   |
|   | Continue to make progress on tree attachment removals and replacing open wire/grey wire within territory yearly.  | 3                      | WMP-GDOM-GH-12a; WMP-GDOM-GH-12e          | Section 8.1.2, pp. 153-170   | Ongoing                                | Liberty completed 78 tree attachment removals in 2025, exceeding its 2025 WMP target of 60 tree attachment removals. Liberty also completed 9.17 miles of open wire/grey wire replacement, exceeding its 2025 WMP target of 5.24 miles. Throughout the 2023-2025 WMP cycle, Liberty exceeded its target for tree attachment removals by 118% (213 tree attachment removals completed of 180 targeted) and its target for open wire/grey wire replacement by 163% (20.97 miles replaced of 12.8 miles targeted).   |
|   | Complete installation of animal guards or “green jackets” on exposed substation equipment.  | 3                      | WMP-GDOM-GH-12c                           | Section 8.1.2, pp. 153-170   | 12/31/2025                             | Liberty completed two animal guard installations in 2025, exceeding its 2025 target 0 animal guards. Both animal guards had been targeted and not installed in 2024 due to delays in material procurement. Both   |

| WMP Category | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs   | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2025   |
|--------------|--|------------------------|--|------------------------------|--|--|
|              |  |                        |  |                              |  | animal guard installations were completed prior to fire season in 2025. Throughout the 2023-2025 WMP cycle, Liberty completed animal guard installations on all six substations targeted.  |
|              | Include LiDAR inspections, covered conductor inspections, infrared inspections and drone inspections in detailed asset inspections or other discretionary asset inspections.                       | 3                      | WMP-GDOM-AI-01;<br>WMP-GDOM-AI-04  | Section 8.1.3, pp. 171-178   | 12/31/2025                             | In 2025, Liberty completed 2.24 miles of drone inspections for outage management, exceeding its 2025 WMP target of 1 mile. In 2024, Liberty completed one mile of drone inspections for outage management and completed a LiDAR inspection of its system. In 2023, Liberty completed 0.1 miles of fixed wing drone infrared inspections on its transmission assets. Additionally, in 2024 and 2025 Liberty included the following additional covered conductor specific conditions to its detailed asset inspection checklist: water intrusion, splice covers, surface damage/bulging, and bracket placement.  |
|              | Include intrusive pole inspections and substation inspections in Asset Inspection QA/QC program and increase the percentage of QA/QC to 12% for detailed inspections.                              | 3                      | WMP-GDOM-AI-01;<br>WMP-GDOM-AI-02;<br>WMP-GDOM-AI-05;<br>WMP-GDOM-AI-06                    | Section 8.1.3, pp. 171-178   | 12/31/2025                             | In 2025, Liberty maintained its increased QA/QC target (from 2024) of 12% for detailed asset inspections. Liberty completed 12% QA/QC of detailed asset inspections in 2025, meeting its 2025 WMP target. Liberty performed informal QA/QC of substation inspections and will work to improve documentation in 2026. Additionally, Liberty exceeded its WMP target of 42 substation inspections by completing 60 substation inspections in 2025. For intrusive pole inspections, full digital documentation was completed for every structure inspected, including timestamped and geolocated photographs for all inspection phases. Inspection records were made available for near real-time, virtual audit. This enabled comprehensive oversight of all of the inspections without reliance on percentage-based sampling. |
|              | Continue to install covered conductor in high fire risk areas at a reduced rate while we gather better data on the risk spend efficiency of this program.  | 10                     | WMP-GDOM-GH-01   | Section 8.1.2, pp. 153-170   | Ongoing                                | See Liberty's response to the same 3-year objective. Liberty plans to continue to assess installing covered conductor in high fire risk areas as a wildfire mitigation over the 10-year time period. Throughout the 10-year time period, Liberty plans to base its decision-making to install covered conductor on its maturing risk model outputs, evolving regulatory requirements, customer impacts and other operational and subject matter expertise. In 2025 Liberty updated its risk model to allow improved analysis of covered conductor projects, which resulted in an increase to the covered conductor target for 2026.  |
|              | Continue to underground conductor in high fire risk areas where economically feasible. Undergrounding is considered as an alternative for any future project.                                      | 10                     | WMP-GDOM-GH-02   | Section 8.1.2, pp. 153-170   | Ongoing                                | See Liberty's response to the same 3-year objective. Liberty plans to continue to assess undergrounding in high fire risk areas as a wildfire mitigation over the 10-year time period. Throughout the 10-year time period, Liberty plans to base its decision-making to underground on its maturing risk model outputs, evolving regulatory requirements, customer impacts and other operational and subject matter expertise.   |
|              | Replace or repair poles in territory that have been deemed necessary by our system surveys.  | 10                     | WMP-GDOM-GH-03   | Section 8.1.2, pp. 153-170   | Ongoing                                | Liberty has completed all repairs and replacements resulting from its 2020 survey of its entire system. Liberty plans to continue to replace and repair poles in its territory deemed necessary by inspections over the 10-year time period, including its new drone asset inspection program planned to be implemented in 2026. Liberty is using circuit wildfire risk scores to prioritize new pole replacements and repairs for 2026.   |
|              | Continue to rebuild or repair high priority overhead conductor in territory to address aging infrastructure and help with reliability and wildfire mitigation.                                     | 10                     | WMP-GDOM-GH-05   | Section 8.1.2.5, pp. 162-163 | Ongoing                                | See Liberty's response to the same 3-year objective. Liberty plans to continue to assess traditional overhead hardening as a wildfire mitigation alternative over the 10-year time period. Throughout the 10-year time period, Liberty plans to base its decision-making to complete traditional overhead hardening projects on its maturing risk model outputs, evolving regulatory requirements, customer impacts and other operational and subject matter expertise.  |
|              | Continue to consider microgrids, and line removal as an alternative solution to help with wildfire mitigation. Currently planning to bring a new microgrid online along with line removal in 2024. | 10                     | WMP-GDOM-GH-07;<br>WMP-GDOM-GH-09  | Section 8.1.2, pp. 153-170   | Ongoing                                | See Liberty's response to the same 3-year objective. Liberty plans to continue to assess microgrids and the associated line removal as wildfire mitigation alternatives over the 10-year time period. Throughout the 10-year time period, Liberty plans to base its decision-making to complete microgrid projects on its maturing risk model outputs, evolving regulatory requirements, customer impacts and other operational and subject matter expertise.  |
|              | Continue to pilot and test effectiveness of Swedish Neutral systems and build out this initiative more if successful.  | 10                     | WMP-GDOM-GH-06   | Section 8.1.2, pp. 153-170   | Ongoing                                | See Liberty's response to the same 3-year objective. Liberty is designing its substation rebuilds with provisions to potentially install Swedish neutral systems where possible if Liberty chooses to pursue this technology.  |
|              | Continuous improvement of Asset Inspection programs as technology offers improvements.   | 10                     | WMP-GDOM-AI-01;<br>WMP-GDOM-AI-02;<br>WMP-GDOM-AI-04;<br>WMP-GDOM-AI-05;<br>WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178   | Ongoing                                | Liberty plans to continually improve its asset inspection programs as technology offers improvements over the 10-year time period. To improve its asset inspection program, Liberty will implement a drone asset inspection program in 2026.   |

| WMP Category          | WMP Objective   | 3 or 10-year Objective | WMP Initiatives and Tracking IDs   | WMP Section and Page Numbers                             | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2025   |
|-----------------------|---|------------------------|--|--|--|--|
|                       | Include risk analysis for prioritization of Asset Inspection programs.                                | 10                     | WMP-GDOM-AI-01;<br>WMP-GDOM-AI-02;<br>WMP-GDOM-AI-04;<br>WMP-GDOM-AI-05;<br>WMP-GDOM-AI-06       | Section 8.1.3, pp. 171-178                               | Ongoing                                | Liberty will implement a drone asset inspection program in 2026 on its HFTD Tier 3 circuits, which include circuits on Liberty's list of highest wildfire risk circuits based on its recent risk analysis.   |
| Vegetation Management | Complete vegetation risk modeling   | 3                      | Clearance, VFM-05;<br>Fall-In Mitigation, VFM-06   | Section 6, pp. 62-111                                    | December 2025                          | Liberty began risk modeling of its system in 2024 and incorporated vegetation management into the model. The vegetation management inputs include historical tree inventories, LiDAR data, and maintenance history to identify risk reduction.   |
|                       | Complete fall-in risk scoring model pilot   | 3                      | Fall-In Mitigation, VFM-06;<br>High-Risk Species, VFM-07   | None in the 2023 WMP; in development                     | December 2025                          | Liberty conducted an analysis of a fall-in risk scoring model derived through LiDAR inspections in 2023 and concluded the assessment in December of 2023.  |
|                       | Implement IVM monitoring program  | 10                     | Fire Resilient Rights-of-Way, VFM-04;  | Section 8.2.2, pp. 210-221<br>Section 8.2.3, pp. 222-234 | December 2032                          | Liberty implemented an IVM monitoring program by establishing monitoring plots on sections of its distribution and transmission lines.   |
|                       | Develop Utility Arborist training program for Liberty's service area                                  | 10                     | Environmental Permitting, Managing Community Impacts, and Program Development Activities, ESG-01 | None in the 2023 WMP; in development                     | December 2032                          | Liberty developed three additional online training modules for arborists in 2025, building off the first three training modules released in 2024.  |
| Situational Awareness | Determine weather station network capacity  | 3                      | WMP-SA-01  | Section 8.3.2, pp. 260-264                               | 2023                                   | All planned weather stations have been installed, and no new weather stations have been determined to be necessary.  |
|                       | Implement maintenance program for weather stations  | 3                      | WMP-SA-01  | Section 8.3.2, pp. 260-264                               | 2023                                   | Liberty implemented a maintenance program for weather stations.. In 2025 this program involved the calibration of all 39 Liberty Weather Stations. In addition to performing standard calibration procedures, the field teams addressed a variety of site-specific operational tasks. These included: <ul style="list-style-type: none"> <li>• Troubleshooting and resolving sensor and communication issues</li> <li>• Implementing wiring modifications required for program updates</li> <li>• Replacing or installing fuel sticks and other equipment</li> <li>• Performing power system checks and maintenance</li> <li>• Firmware, template, program, OS updates for the modems and dataloggers</li> </ul> |
|                       | Research emerging technologies for future fault detection pilot programs                              | 3                      | WMP-SA-02  | None in 2023 WMP; in development                         | Not known                              | The University of Nevada Reno ("UNR") completed a Fire Mitigation Protection System Study for Liberty that looked at High Impedance Fault Detection ("HIFD"). The study recommended that Liberty should pursue a fast trip or SRP scheme to reduce fire risk. Liberty implemented its SRP Program in 2024 and 2025. As a part of ACI LU-25U-08, Liberty committed to performing another study re-evaluating its use of High Impedance Fault Detection in 2026. This study was completed in Q1 2026.  |
|                       | Work with AlertWildfire to own and operate cameras to track smoke and fires                           | 3                      | WMP-SA-03  | Section 8.3.4, pp. 269-272                               | 2023                                   | In 2025, Liberty executed an agreement with the University of Nevada Reno (UNR) to adopt the existing ALERT Tahoe camera network, adding 16 sites to its portfolio of wildfire camera locations. The cameras are owned and operated by UNR and operations and maintenance costs are sponsored by Liberty.  |
|                       | Implement new technologies if available (i.e., AI smoke detection) to identify ignitions more quickly | 10                     | WMP-SA-03  | Section 8.3.4, pp. 269-272                               | Not known                              | In 2025, Liberty executed an agreement with the University of Nevada Reno (UNR) to adopt the existing ALERT Tahoe camera network, adding 16 sites to its portfolio of wildfire camera locations These cameras provide AI early detection alerts from the ALERTWest/ALERTCalifornia Websites, which are used by fire suppression agencies to notify them of ignitions more quickly than traditional means   |
|                       | Improve weather forecasting capabilities as models improve or additional data becomes available       | 10                     | WMP-SA-01  | Section 8.3.2, pp. 260-264                               | Not known                              | Liberty worked with its weather and fire science consultants to maintain its situational awareness and weather forecasting capabilities.   |

| WMP Category           | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2025  |
|------------------------|--|------------------------|----------------------------------|------------------------------|--|---|
| Emergency Preparedness | Update workforce training on incident Command System ("ICS")                                   | 3                      | WMP-EP-01                        | Section 8.4.2.2, pp. 294-301 | June 2023                              | All Incident Management Team members have received training through Liberty's Learning Management System (LMS). LMS module addresses Incident Command response and is based on the FEMA ICS 100 and ICS 200 courses. Training participation is assigned and tracked through the LMS system. Initiative was completed for the 2023-2025 WMP cycle. As Liberty adds new members to its Incident Management Team, those individuals receive training in ICS 100, 200, 700, and 800 through Liberty's Learning Management System (LMS). The LMS leverages the FEMA training website for both instruction and certification, ensuring members are up to speed.   |
|                        | Ongoing Maintenance of Emergency Response Plans  | 3                      | WMP-EP-02                        | Section 8.4.2, pp. 290-309   | Annual (June 2024 and June 2025)       | Emergency Management maintains an All Hazards Emergency Response Plan. The main plan details emergency response procedures and separate annexes or play books address, Wildfire, Winter Storms, and Public Safety Power Shutoffs. Liberty's PSPS Playbook was updated on January 24, 2025, April 11, 2025, and June 23, 2025. Liberty's CEMP was updated on May 6, 2025.  |
|                        | Continued engagement with local stakeholders to prepare for and respond to fire-related events | 3                      | WMP-EP-03                        | Section 8.4.2, pp. 290-309   | Annual (June 2024 and June 2025)       | Liberty engages with local stakeholders to prepare for and respond to fire related events. In 2025, Liberty engaged with local stakeholders through multiple fire-related preparedness activities, including participation in community wildfire safety fairs and outreach events. Liberty conducted its annual Public Safety Partner Workshop on April 3, 2025, held a PSPS tabletop exercise on May 28, 2025, and a full-scale exercise on June 26, 2025. Participation included Cal Fire, Cal OES, CPUC, OEIS and local government partners. Liberty also engaged AFN-focused stakeholders throughout the year including delivering PSPS presentations to local organizations and agencies, hosting Open House events throughout the service territory, distributing preparedness materials to local organizations and agencies, and hosting a virtual CBO webinar focused on PSPS awareness on June 27, 2025. Additionally, Liberty participates as a Collaborating Member of the Tahoe Fire and Fuels Team. The TFFT is a multi-agency coalition that focuses on coordinated wildfire prevention work in the Lake Tahoe Basin, including fuels reduction, community preparedness, public outreach, and interagency planning. |
|                        | Enhanced documentation and use of lessons learned to update plans                              | 3                      | WMP-EP-04                        | Section 8.4.3, pp. 310-326   | Annual (June 2024 and June 2025)       | Individual Emergency Response Plan annexes are increased in granularity through Liberty Utilities' Lessons Learned Program. Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are subsequently updated to reflect lessons learned and increase granularity. In 2025, AARs were recorded for one PSPS event, winter storms, and a Community Resource Center specific AAR session after Liberty's PSPS activation on November 5, 2025. These lessons learned resulted in improvements including updating CRC staffing lists, adding exterior CRC signage, and addressing larger water-supply needs for customers. Liberty also implemented several documentation enhancements from PSPS exercises, including updating the PSPS Playbook to reflect Incident Command role titles, adding Field Services and Vegetation Management to the ICS report-out agenda, incorporating water-conservation reminders into PSPS messaging, posting PSPS educational videos during events, and updating the Operations PSPS Playbook to align with these changes.                              |
|                        | Ongoing Maintenance of Emergency Response Plans  | 10                     | WMP-EP-02                        | Section 8.4.2, pp. 290-309   | Ongoing                                | Please see Liberty's response for 3 year objective WMP-EP-02. Liberty plans to continue ongoing maintenance of its Emergency Response Plans throughout the 10 year period.  |
|                        | Continued engagement with local stakeholders to prepare for and respond to fire-related events | 10                     | WMP-EP-03                        | Section 8.4.2, pp. 290-309   | Ongoing                                | Please see Liberty's response for 3 year objective WMP-EP-03. Liberty plans to continue ongoing engagement with local stakeholders to prepare for and respond to fire related events.   |
|                        | Enhanced documentation and use of lessons learned to update plans                              | 10                     | WMP-EP-04                        | Section 8.4.3, pp. 310-326   | Ongoing                                | Please see Liberty's response for 3 year objective WMP-EP-04. Liberty plans to continue utilizing lessons learned to inform updates to applicable plans, processes, and documentation.  |
|                        | Increase granularity and customization of response plans                                       | 10                     | WMP-EP-05                        | Section 8.4.2, pp. 290-309   | January 2030                           | Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are   |

| WMP Category       | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2025   |
|--------------------|--|------------------------|----------------------------------|------------------------------|--|--|
|                    |  |                        |                                  |                              |  | subsequently updated to reflect lessons learned and increase granularity of the plans. In 2025, this included updates to PSPS playbook elements such as refining Incident Command role definitions and incorporating additional operational departments.   |
| Community Outreach | Implement planned communication channels and technologies with customers, community, and stakeholders.   | 3                      | WMP-CO-03                        | Section 8.5.2, pp. 354-359   | May 2024                               | Planned communications channels and technologies have been implemented with customers, the community and stakeholders. Liberty's EOC structure includes liaison communication with key stakeholders, Community Based Organizations, Public Safety Partners, and OES partners. Liberty uses the Onsolve platform to communicate with its customers via text, phone call, and email during outages and before, during, and after PSPS events. Liberty's wildfire mitigation efforts and PSPS education are shared in our customer communications channels: emails, social media, direct mail, and website throughout the year. In addition, Liberty purchases digital ads May-October geo-targeting our customers. Liberty purchases print ads and radio May-October, and participates throughout the year in community outreach efforts as well.  |
|                    | Engage Community Based Organizations and expand network of contacts in each area of Liberty service territory, including South Lake Tahoe, North Lake Tahoe, Coleville/Walker, and Loyalton/Portola communities. | 3                      | WMP-CO-03                        | Section 8.5.2, pp. 354-359   | Ongoing                                | Liberty continued to network with local organizations in 2025, participating in Community Collaborative meetings in both North and South Lake Tahoe communities, participating in collaborative community outreach events throughout the service territory, and holding targeted Community Based Organization presentations regarding PSPS preparedness, AFN self-identification, and customer assistance program information. Liberty plans to continue development of CBO relationships throughout its service territory.  |
|                    | Work collaboratively with CBO networks to support, educate, notify, and prepare AFN communities.   | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | In 2025, Liberty utilized its connections to local organizations by participating in community events and holding presentations in collaboration with CBOs. These events were valuable opportunities to educate and prepare AFN communities across Liberty's service territory regarding PSPS Preparedness, customer assistance programs, and AFN self-identification. Events and outreach included Liberty participation in community events, Liberty hosted Open Houses through collaboration with local partners throughout the service territory, senior center presentations, collaborative events organized with LIHEAP administrators, and outreach conducted at multifamily housing locations. Liberty also collaborates with senior nutrition programs to administer shelf stable meal boxes filled with food items, water, PSPS and wildfire preparedness information, and customer assistance program information including AFN self-ID. This outreach approach focuses on reaching vulnerable populations through leveraging trusted and established networks.   |
|                    | Work collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities.   | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Liberty worked collaboratively in 2025 with Public Safety Partners across the service territory through inclusion in preparedness planning, presentations, community outreach, and direct communications. Liberty participated in local wildfire preparedness events and organized a Community Resource Center demonstration on site through collaboration with their CRC contractor, FireDawg. Additionally, Liberty participates as a Collaborating Member of the Tahoe Fire and Fuels Team. The TFFT is a multi-agency coalition that focuses on coordinated wildfire prevention work in the Lake Tahoe Basin, including fuels reduction, community preparedness, public outreach, and interagency planning.  |
|                    | Support bilingual outreach through the utilization of bilingual Outreach Coordinator.  | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Liberty employs a bilingual Outreach Specialist as part of the Community Outreach Team. This position provides outreach to the Spanish speaking population in Liberty's service territory. The responsibilities of the position include assisting Spanish speaking customers fill out applications for Liberty community assistance programs and providing Spanish language support at outreach events and presentations.  |
|                    | Identify improvements to overall accessibility of information available to AFN customers.  | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | In 2025, Liberty spread preparedness information via direct mailing to all identified AFN customers and provided preparedness information to vulnerable senior populations through a shelf-stable meal box effort. CBO feedback has informed Liberty of the value of paper materials in reaching senior populations, and each meal box contained materials related to PSPS and wildfire preparedness information and customer assistance program information including AFN self-ID. Collaborative outreach with CBOs allows Liberty to consider how to target AFN categories when providing this information, and results obtained from Liberty's biannual Wildfire Awareness Survey provides valuable insight regarding communication approach. Liberty revised direct mail content related to PSPS and wildfire preparedness reaching AFN communities with simplified language and format improvements in 2025. Additionally, field audits were performed on all Medical Baseline customer households providing door hangers describing PSPS notification pre-season. Phone calls were placed to confirm Medical Baseline customer contact information utilizing a simplified script describing Public Safety Power Shutoff processes and notification information. Liberty also revised |

| WMP Category | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2025   |
|--------------|--|------------------------|----------------------------------|------------------------------|--|--|
|              |  |                        |                                  |                              |  | their AFN self-ID web form and paper forms to simplify self-identification in 2025. Liberty plans to continue identifying improvements to overall accessibility of information available to AFN customers through best practice sharing, participation in the AFN Joint IOU Council and AFN Statewide Council, and engagement with local stakeholders and customers.   |
|              | Encourage self-identification of AFN customers through targeted outreach and communications.   | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | AFN self-ID forms are shared with local organizations, at outreach events, Community Resource Centers, and are available on the Liberty website in both English and Spanish. Customer assistance program enrollment also informs AFN identification of customers, as well as date of birth information in Liberty's system. Liberty also encourages AFN identification through ad campaigns. Liberty spreads AFN self-ID program awareness to CBOs and agencies working with AFN communities to educate customers and encourage enrollment through sharing AFN self-ID paper forms, AFN self-ID website links, and discussing benefit of identification. |
|              | Regular PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy.  | 3                      | WMP-CO-03                        | Section 8.5.4, pp. 363-366   | Ongoing                                | Liberty conducts regular PSPS meetings with Tahoe Donner PUD and NV Energy. Meetings are conducted every 1-2 weeks during fire season and every 2-4 weeks throughout the remainder of the year. These meetings provide an opportunity for Liberty to collaborate with NVE and TDPUD with a focus on situational awareness, emergency management, and fire mitigation.  |
|              | Effective stakeholder communication through tailored approaches for outreach, engagement and information exchange with customers, communities and stakeholders based on various groups' unique needs. Identify emerging channels and technologies to better communicate with customers, community, and stakeholders. | 10                     | WPM-CO-01; Best practice sharing | Section 8.5.2, pp. 354-359   | June 2026                              | Please see Liberty's response for the same 3 year objective for WMP-CO-01. Liberty plans to continue their efforts in effective stakeholder communication through tailored approaches.   |
|              | Engage CBOs and further expand network of contacts in each area of Liberty service territory, including South Lake Tahoe, North Lake Tahoe, Coleville/Walker, and Loyalton/Portola communities.  | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Please see Liberty's response for the same 3 year objective for WMP-CO-03. Liberty plans to continue development of CBO relationships throughout its service territory.  |
|              | Continue to work collaboratively with CBO networks to support, educate, notify, and prepare AFN communities.   | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Please see Liberty's response to the same 3 year objective for WMP-CO-03. Liberty plans to continue working collaboratively with CBO networks and agencies to support, educate, notify, and prepare AFN communities.   |
|              | Continue to work collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities.   | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Please see Liberty's response to the same 3 year objective for WMP-CO-03. Liberty plans to continue working collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities.  |
|              | Continue to support bilingual outreach efforts.  | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Please see Liberty's response to the same 3 year objective for WMP-CO-03. Liberty plans to continue to support bilingual outreach efforts through materials, presentations, and outreach events.   |
|              | Identify improvements to overall accessibility of information available to AFN Customers.  | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Please see Liberty's response to the same 3 year objective for WMP-CO-03. Liberty plans to identify improvements to overall accessibility of information available to AFN customers.   |
|              | Continue to encourage self-identification of AFN status through targeted outreach efforts and communications.  | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Please see Liberty's response to the same 3 year objective for WMP-CO-03. Liberty plans to continue encouraging AFN self-ID through targeted outreach efforts and communications to reach vulnerable populations.  |
|              | Ongoing PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy.  | 10                     | WMP-CO-03                        | Section 8.5.4, pp. 363-366   | Ongoing                                | Please see Liberty's response to the same 3 year objective for WMP-CO-03. Liberty plans to continue coordination meetings with Tahoe Donner Public Utility District and NV Energy.   |

**C. Liberty's assessment of completion of three- and 10-year objectives listed in the tables in Section 8 of Liberty's 2023-2025 WMP.**

Liberty's assessment of its completion of its three- and 10-year objectives detailed in Section 8 of its 2023-2025 WMP is included in Table 3 below.

**Table 3: Assessment of Completion of 2023-2025 WMP Section 8 Detailed Objectives**

| WMP Category                            | WMP Objective   | 3 or 10-year Objective | WMP Initiatives and Tracking IDs          | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective             | Method of Verification                      | Explanation of Method of Verification Use  | Assessment of Completing Objective   | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions?  |
|---|---|------------------------|---|------------------------------|--|--|---|--|--|--|------------------------------------|--|
| Grid Design, Operations and Maintenance | Build out a Sensitive Relay Profile (“SRP”) program throughout Liberty’s system to reduce ignition risk. Install additional reclosers to help with sectionalization. Install additional fault indicators to help with reliability | 3                      | WMP-GDOM-GO-01; WMP-GDOM-GH-08; WMP-SA-02 | Section 8.1.2, pp. 153-170   | 12/31/2025                             | Completed December 23, 2025                  | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |
|   | Continue to install covered conductor in high fire risk areas at a reduced rate while we gather better data on the risk spend efficiency of this program.   | 3                      | WMP-GDOM-GH-01                            | Section 8.1.2, pp. 153-170   | Ongoing                                | 2025 covered conductor completed Q4 2025.    | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |
|   | Continue to underground conductor in high fire risk areas where economically feasible. Undergrounding is considered as an alternative for any future project.   | 3                      | WMP-GDOM-GH-02                            | Section 8.1.2, pp. 153-170   | Ongoing                                | 2025 undergrounding completed Q4 2025.       | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |
|   | Replace or repair poles in territory that have been deemed necessary by our system surveys.   | 3                      | WMP-GDOM-GH-03                            | Section 8.1.2, pp. 153-170   | Ongoing                                | 2025 pole replacements completed in Q4 2025. | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |
|   | Continue to rebuild or repair high priority overhead conductor in territory to address aging infrastructure and help with reliability and wildfire mitigation.  | 3                      | WMP-GDOM-GH-05                            | Section 8.1.2.5, pp. 162-163 | Ongoing                                | Complete for 2023-2025 WMP cycle.            | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |
|   | Pilot the resonant grounding or “Swedish neutral” system on one substation within three years, test its risk spend efficiency and effectiveness.  | 3                      | WMP-GDOM-GH-06                            | Section 8.1.2, pp. 153-170   | TBD                                    | TBD  | Annual WMP filings; QDR and GIS submissions | If completed, Liberty will include information on the pilot in its annual WMP filings and QDR. | In Liberty's 2025 WMP Update, Liberty revised its objective completion date to TBD and explained that piloting the Swedish neutral technology was delayed to assess future cost and resource needs.  | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | Liberty is designing its substation rebuilds with provisions to potentially install Swedish neutral systems where possible if Liberty chooses to pursue this technology at a later date. |
|   | Continue to consider microgrids, and line removal as an alternative solution to help with wildfire mitigation. Currently planning to bring a new microgrid online along with line removal in 2024.                                | 3                      | WMP-GDOM-GH-07; WMP-GDOM-GH-09            | Section 8.1.2, pp. 153-170   | Ongoing                                | Complete for 2023-2025 WMP cycle.            | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | Complete. Although Liberty did not install a microgrid in 2024, this was due to a determination to replace the microgrid project with a covered conductor project, after an assessment that the expected size, costs, and lead times for the microgrid were higher than anticipated. Liberty | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |

| WMP Category | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs                               | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective                                       | Method of Verification   | Explanation of Method of Verification Use   | Assessment of Completing Objective   | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions?  |
|--------------|--|------------------------|--|------------------------------|--|--|--|---|--|--|------------------------------------|--|
|              |  |                        |  |                              |  |  |  |   | will continue to consider microgrids and line removal as a wildfire mitigation alternative.  |  |                                    |  |
|              | Continue to make progress on tree attachment removals and replacing open wire/grey wire within territory yearly.   | 3                      | WMP-GDOM-GH-12a; WMP-GDOM-GH-12e                               | Section 8.1.2, pp. 153-170   | Ongoing                                | 2025 tree attachment removals completed in Q4 2025.                    | Annual WMP filings; QDR and GIS submissions                      | Liberty includes completed projects in its QDR and quarterly GIS reporting.   | Completed targets for animal guards and open wire/grey wire replacement.   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |
|              | Complete installation of animal guards or "green jackets" on exposed substation equipment.   | 3                      | WMP-GDOM-GH-12c  | Section 8.1.2, pp. 153-170   | 12/31/2025                             | Completed July 9, 2025.  | Annual WMP filings   | Liberty includes completed projects in its QDR and quarterly GIS reporting.   | Completed animal guards on all substations throughout 2023-2025 WMP cycle.   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |
|              | Include LiDAR inspections, covered conductor inspections, infrared inspections and drone inspections in detailed asset inspections or other discretionary asset inspections. | 3                      | WMP-GDOM-AI-01; WMP-GDOM-AI-04                                 | Section 8.1.3, pp. 171-178   | 12/31/2025                             | Completed drone inspections and covered conductor inspections in 2025. | Annual WMP filings; QDR and GIS submissions                      | Liberty includes completed inspections in its QDR. Liberty's asset inspection checklist is contained in its Fulcrum database. | Completed in 2025 and throughout 2023-2025 WMP cycle.  | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A  |
|              | Include intrusive pole inspections and substation inspections in Asset Inspection QA/QC program and increase the percentage of QA/QC to 12% for detailed inspections.        | 3                      | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-05; WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178   | 12/31/2025                             | Completed in Q4 2025.  | Annual WMP filings; QDR and GIS submissions; QA/QC documentation | Liberty includes completed inspections in its QDR.  | Liberty completed 12% QA/QC target in Q4 2025. Liberty performed informal QA/QC of substation inspections. Additionally, Liberty exceeded its WMP target of 42 substation inspections by completing 60 substation inspections in 2025. For intrusive pole inspections, full digital documentation was completed for every structure inspected, including timestamped and geolocated photographs for all inspection phases. Inspection records were made available for near real-time, virtual audit. This enabled comprehensive oversight of all of the inspections without reliance on percentage-based sampling. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | Liberty performs informal QA/QC on substation inspections. Liberty will improve documentation of this process in the future. |

| WMP Category | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs   | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification   | Explanation of Method of Verification Use  | Assessment of Completing Objective  | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions?   |
|--------------|--|------------------------|--|------------------------------|--|----------------------------------|--|--|---|--|------------------------------------|---|
|              | Continue to install covered conductor in high fire risk areas at a reduced rate while we gather better data on the risk spend efficiency of this program.  | 10                     | WMP-GDOM-GH-01   | Section 8.1.2, pp. 153-170   | Ongoing                                | Ongoing                          | Annual WMP filings; QDR and GIS submissions                      | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | On track. Based on its updated risk modeling for 2026, Liberty has increased its 2026 covered conductor target to 7 miles.  | Yes, objective is applicable to the 10-year time period. | N/A                                | N/A   |
|              | Continue to underground conductor in high fire risk areas where economically feasible. Undergrounding is considered as an alternative for any future project.                                      | 10                     | WMP-GDOM-GH-02   | Section 8.1.2, pp. 153-170   | Ongoing                                | Ongoing                          | Annual WMP filings; QDR and GIS submissions                      | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | On track. Liberty will continue to consider undergrounding as a wildfire mitigation.  | Yes, objective is applicable to the 10-year time period. | N/A                                | N/A   |
|              | Replace or repair poles in territory that have been deemed necessary by our system surveys.  | 10                     | WMP-GDOM-GH-03   | Section 8.1.2, pp. 153-170   | Ongoing                                | Ongoing                          | Annual WMP filings; QDR and GIS submissions                      | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | On track. Liberty will continue to replace and repair poles deemed necessary by its asset inspections.  | Yes, objective is applicable to the 10-year time period. | N/A                                | N/A   |
|              | Continue to rebuild or repair high priority overhead conductor in territory to address aging infrastructure and help with reliability and wildfire mitigation.                                     | 10                     | WMP-GDOM-GH-05   | Section 8.1.2.5, pp. 162-163 | Ongoing                                | Ongoing                          | Annual WMP filings; QDR and GIS submissions                      | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | On track. Liberty will continue to consider overhead hardening as a wildfire mitigation.  | Yes, objective is applicable to the 10-year time period. | N/A                                | N/A   |
|              | Continue to consider microgrids, and line removal as an alternative solution to help with wildfire mitigation. Currently planning to bring a new microgrid online along with line removal in 2024. | 10                     | WMP-GDOM-GH-07; WMP-GDOM-GH-09   | Section 8.1.2, pp. 153-170   | Ongoing                                | Ongoing                          | Annual WMP filings; QDR and GIS submissions                      | Liberty includes completed projects in its QDR and quarterly GIS reporting.                    | On track. Liberty will continue to consider microgrids and line removal as a wildfire mitigation alternative  | Yes, objective is applicable to the 10-year time period. | N/A                                | N/A   |
|              | Continue to pilot and test effectiveness of Swedish Neutral systems and build out this initiative more if successful.  | 10                     | WMP-GDOM-GH-06   | Section 8.1.2, pp. 153-170   | Ongoing                                | TBD                              | Annual WMP filings; QDR and GIS submissions                      | If completed, Liberty will include information on the pilot in its annual WMP filings and QDR. | TBD - In Liberty's 2025 WMP Update, Liberty revised its objective completion date to TBD and explained that the objective completion date for piloting the Swedish neutral technology was delayed to assess future cost and resource needs.               | Yes, objective is applicable to the 10-year time period. | N/A                                | Liberty is designing its substation rebuilds with provisions to potentially install Swedish neutral systems where possible if Liberty chooses to pursue this technology at a later date |
|              | Continuous improvement of Asset Inspection programs as technology offers improvements.   | 10                     | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-04; WMP-GDOM-AI-05; WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178   | Ongoing                                | Ongoing                          | Annual WMP filings; QDR and GIS submissions; QA/QC documentation | Liberty includes information on asset inspection programs in its annual WMP.                   | On track. Liberty plans to continually improve its asset inspection programs as technology offers improvements over the 10-year time period. As discussed in its 2026-2028 Base WMP, Liberty plans to implement a drone asset inspection program in 2026. | Yes, objective is applicable to the 10-year time period. | N/A                                | N/A   |

| WMP Category          | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs   | WMP Section and Page Numbers                             | Completion Date Listed in Approved WMP | Date Liberty Completed Objective  | Method of Verification  | Explanation of Method of Verification Use  | Assessment of Completing Objective   | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions? |
|-----------------------|--|------------------------|--|--|--|---|---|--|--|--|------------------------------------|---------------------|
|                       | Include risk analysis for prioritization of Asset Inspection programs. | 10                     | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-04; WMP-GDOM-AI-05; WMP-GDOM-AI-06                   | Section 8.1.3, pp. 171-178                               | Ongoing                                | Ongoing   | Annual WMP filings  | Liberty includes information on asset inspection programs in its annual WMP.   | On track. As discussed in its 2026-2028 Base WMP, Liberty plans to implement a drone asset inspection program in 2026 on its HFTD 3 circuits.                                | Yes, objective is applicable to the 10-year time period. | N/A                                | N/A                 |
| Vegetation Management | Complete vegetation risk modeling                                      | 3                      | Clearance, VFM-05; Fall-In Mitigation, VFM-06  | Section 6, pp. 62-111                                    | December 2025                          | Completed 2025 – VM data was integrated into the risk model in 2024. Updated data is provided annually and objective will be ongoing. | WMP reporting, report from 3rd party project manager, QA/QC                 | Liberty includes information on risk modeling in its annual WMP.   | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                       | Complete fall-in risk scoring model pilot                              | 3                      | Fall-In Mitigation, VFM-06; High-Risk Species, VFM-07  | None in the 2023 WMP; in development                     | December 2025                          | Completed December 2023.  | WMP reporting, methodology provided by vendor, internal analysis and report | Liberty documented its analysis of this objective.   | Completed  | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                       | Implement IVM monitoring program                                       | 10                     | Fire Resilient Rights-of-Way, VFM-04;  | Section 8.2.2, pp. 210-221<br>Section 8.2.3, pp. 222-234 | December 2032                          | Ongoing. The IVM monitoring program was implemented in 2024.  | IVM monitoring data and records   | Field data collection software is used to record IVM monitoring data for analysis.   | This objective has been completed for the 2023-2025 WMP cycle with the implementation of the program. The program will be ongoing and is on track for the 10 year objective. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                       | Develop Utility Arborist training program for Liberty's service area   | 10                     | Environmental Permitting, Managing Community Impacts, and Program Development Activities, ESG-01 | None in the 2023 WMP; in development                     | December 2032                          | Ongoing. The Arborist training program was implemented in 2024.   | Training records and documentation of training program                      | Arborist training program is documented and completion of training modules is tracked and recorded.                          | This objective has been completed for the 2023-2025 WMP cycle with the implementation of the program. The program will be ongoing and is on track for the 10 year objective. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
| Situational Awareness | Determine weather station network capacity                             | 3                      | WMP-SA-01  | Section 8.3.2, pp. 260-264                               | 2023                                   | Complete – 12/31/2025   | Weather station optimization tool results                                   | Analysis showing coverage of system with existing weather station network is used to determine need for additional stations. | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                       | Implement maintenance program for weather stations                     | 3                      | WMP-SA-01  | Section 8.3.2, pp. 260-264                               | 2023                                   | Complete – implemented in July 2024 and continued through 2025  | Invoices, work orders   | Documentation of weather station inspections, calibrations, maintenance, and repairs for each weather station                | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |

| WMP Category                  | WMP Objective   | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers     | Completion Date Listed in Approved WMP | Date Liberty Completed Objective        | Method of Verification                            | Explanation of Method of Verification Use   | Assessment of Completing Objective   | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions? |
|-------------------------------|---|------------------------|----------------------------------|----------------------------------|--|---|---|---|--|--|------------------------------------|---------------------|
|                               | Research emerging technologies for future fault detection pilot programs                              | 3                      | WMP-SA-02                        | None in 2023 WMP; in development | Not known                              | Ongoing                                 | Annual WMP  | Liberty includes relevant information in Situational Awareness Section of its Annual WMP and in response to Energy Safety Areas of Improvement. | Completed for 2023-2025 WMP cycle. As a part of ACI LU-25U-08, Liberty committed to performing another study re-evaluating its use of High Impedance Fault Detection in 2026. This study was completed in Q1 2026. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                               | Work with AlertWildfire to own and operate cameras to track smoke and fires                           | 3                      | WMP-SA-03                        | Section 8.3.4, pp. 269-272       | 2023                                   | Complete – agreement finalized in 2025. | Service agreement                                 | Working with University of Nevada Reno to execute contract.   | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                               | Implement new technologies if available (i.e., AI smoke detection) to identify ignitions more quickly | 10                     | WMP-SA-03                        | Section 8.3.4, pp. 269-272       | Not known                              | Ongoing                                 | Invoices, work statements, agreements             | Documents evaluation or implementation of new technologies.   | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                               | Improve weather forecasting capabilities as models improve or additional data becomes available       | 10                     | WMP-SA-01                        | Section 8.3.2, pp. 260-264       | Not known                              | Ongoing                                 | Program   | Documentation of improved weather forecasting capabilities.   | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle  | N/A                                | N/A                 |
| <b>Emergency Preparedness</b> | Update workforce training on Incident Command System (“ICS”)  | 3                      | WMP-EP-01                        | Section 8.4.2.2, pp. 294-301     | June 2023                              | Completed August 2023.                  | G.O. 166  | Learning Management System Completion Reports.  | Complete   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                               | Ongoing Maintenance of Emergency Response Plans   | 3                      | WMP-EP-02                        | Section 8.4.2, pp. 290-309       | Annual (June 2024 and June 2025)       | Complete CEMP updated in May 2025.      | Corporate Emergency Response Plan (“CEMP”)        | Corporate Emergency Response Plan (“CEMP”) change log.  | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                               | Continued engagement with local stakeholders to prepare for and respond to fire-related events        | 3                      | WMP-EP-03                        | Section 8.4.2, pp. 290-309       | Annual (June 2024 and June 2025)       | Complete                                | CEMP  | Meetings logged in the community outreach meeting tracking document.  | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                               | Enhanced documentation and use of lessons learned to update plans                                     | 3                      | WMP-EP-04                        | Section 8.4.3, pp. 310-326       | Annual (June 2024 and June 2025)       | Complete                                | CEMP  | After Action Reports.   | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                               | Ongoing Maintenance of Emergency Response Plans   | 10                     | WMP-EP-02                        | Section 8.4.2, pp. 290-309       | Ongoing                                | Ongoing                                 | Change Log in Corporate Emergency Management Plan | Corporate Emergency Response Plan (“CEMP”) change log.  | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                               | Continued engagement with local stakeholders to prepare for and respond to fire-related events        | 10                     | WMP-EP-03                        | Section 8.4.2, pp. 290-309       | Ongoing                                | Ongoing                                 | Tahoe Fire and Fuels Team meeting documentation   | Community outreach meeting tracking document.   | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |

| WMP Category       | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification  | Explanation of Method of Verification Use  | Assessment of Completing Objective   | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions? |
|--------------------|--|------------------------|----------------------------------|------------------------------|--|----------------------------------|---|--|--|--|------------------------------------|---------------------|
|                    | Enhanced documentation and use of lessons learned to update plans  | 10                     | WMP-EP-04                        | Section 8.4.3, pp. 310-326   | Ongoing                                | Ongoing                          | Change Log in Corporate Emergency Management Plan   | After Action Reports. Corporate Emergency Response Plan ("CEMP") change log.                               | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                    | Increase granularity and customization of response plans   | 10                     | WMP-EP-05                        | Section 8.4.2, pp. 290-309   | January 2030                           | Ongoing                          | Existence of emergency plans based on type of emergency   | Review of Corporate Emergency Response Plan ("CEMP") and associated Playbooks.                             | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
| Community Outreach | Implement planned communication channels and technologies with customers, community, and stakeholders.   | 3                      | WMP-CO-03                        | Section 8.5.2, pp. 354-359   | May 2024                               | Complete                         | Documentation of outreach. <sup>1</sup>   | Communication efforts are tracked in community outreach tracking document.                                 | Completed for the 2023-2025 WMP cycle. Liberty utilizes a variety of communication channels to communicate with customers, community and stakeholders. Communication will be ongoing and is on track for the 10 year objective.  | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                    | Engage Community Based Organizations and expand network of contacts in each area of Liberty service territory, including South Lake Tahoe, North Lake Tahoe, Coleville/Walker, and Loyalton/Portola communities. | 3                      | WMP-CO-03                        | Section 8.5.2, pp. 354-359   | Ongoing                                | Complete                         | Documentation of instances of information sharing and in-person or virtual meetings with Community Based Organizations  | Community based organization and community outreach is documented in community outreach tracking document. | Completed for the 2023-2025 WMP cycle. Liberty engaged CBOs in a variety of ways including holding in-person and virtual meetings and participating in collaborative outreach. CBO engagement will be ongoing and is on track for the 10 year objective.   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|                    | Work collaboratively with CBO networks to support, educate, notify, and prepare AFN communities.   | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Complete                         | Documentation of outreach efforts and collaborative events; documentation of CBO information sharing regarding upcoming events or program information updates | Community based organization and community outreach is documented in community outreach tracking document. | Completed for the 2023-2025 WMP cycle. Liberty engaged CBOs in a variety of ways including holding in-person and virtual meetings and participating in collaborative outreach to educate, notify, and prepare AFN communities. CBO engagement will be ongoing and is on track for the 10 year objective. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |

<sup>1</sup> Liberty erroneously included an incorrect method of verification for this objective in its 2023-2025 WMP and is providing a correct method of verification in this report.

| WMP Category | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification   | Explanation of Method of Verification Use   | Assessment of Completing Objective  | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions? |
|--------------|--|------------------------|----------------------------------|------------------------------|--|----------------------------------|--|---|---|--|------------------------------------|---------------------|
|              | Work collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities. | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Complete                         | Documentation of collaborative meetings, outreach, and Public Safety Partner participation.                                      | Documentation in community outreach tracking document; documentation of meetings and participants.  | Completed for the 2023-2025 WMP cycle. Liberty engaged PSPs in a variety of ways including preparedness planning, presentations, and community outreach. PSP engagement will be ongoing and is on track for the 10 year objective.  | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Support bilingual outreach through the utilization of bilingual Outreach Coordinator.                      | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Complete                         | Documentation of outreach including bilingual support  | Community based organization and community outreach is documented in community outreach tracking document.  | Completed for the 2023-2025 WMP cycle. Liberty's Community Outreach Specialist offered Spanish language support at community outreach, presentations, and during program application processes. Bilingual outreach will be ongoing and is on track for the 10 year objective. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Identify improvements to overall accessibility of information available to AFN customers.                  | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Complete                         | Documentation of accessibility improvements as applicable  | Liberty's AFN Plan and quarterly updates summarize improvements as applicable.  | Completed for the 2023-2025 WMP cycle. Liberty revised AFN facing communications to implement accessibility improvements in 2025. Improvement identification will be ongoing and is on track for the 10 year objective.   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Encourage self-identification of AFN customers through targeted outreach and communications.               | 3                      | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Complete                         | Assessment of identified AFN customer counts each quarter; Documentation of AFN Self-Id Tool content inclusion in communications | Community based organization and community outreach encouraging AFN awareness is documented in community outreach tracking document. Liberty's AFN web forms also track identification. | Completed for the 2023-2025 WMP cycle. Liberty encouraged AFN self-ID through material sharing with CBOs, customer communications, and community outreach. AFN self-ID will be ongoing and is on track for the 10 year objective.   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |

| WMP Category | WMP Objective  | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification  | Explanation of Method of Verification Use  | Assessment of Completing Objective   | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions? |
|--------------|--|------------------------|----------------------------------|------------------------------|--|----------------------------------|---|--|--|--|------------------------------------|---------------------|
|              | Regular PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy.  | 3                      | WMP-CO-03                        | Section 8.5.4, pp. 363-366   | Ongoing                                | Complete                         | Meeting notes   | Documentation of meeting and participants.   | Completed for the 2023-2025 WMP cycle. Liberty conducts regular PSPS meetings with Tahoe Donner PUD and NV Energy. Coordination meetings will be ongoing and are on track for the 10 year objective. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Effective stakeholder communication through tailored approaches for outreach, engagement and information exchange with customers, communities and stakeholders based on various groups' unique needs. Identify emerging channels and technologies to better communicate with customers, community, and stakeholders. | 10                     | WPM-CO-01; Best practice sharing | Section 8.5.2, pp. 354-359   | June 2026                              | Ongoing                          | Documented instances of collaboration between the electrical corporation and outside entities, including agendas, meeting minutes, and participant lists      | Communication efforts are tracked in community outreach tracking document.                                 | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Engage CBOs and further expand network of contacts in each area of Liberty service territory, including South Lake Tahoe, North Lake Tahoe, Coleville/Walker, and Loyalton/Portola communities.  | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Ongoing                          | Documentation of instances of information sharing and in-person or virtual meetings with Community Based Organizations  | Community based organization and community outreach is documented in community outreach tracking document. | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Continue to work collaboratively with CBO networks to support, educate, notify, and prepare AFN communities.   | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Ongoing                          | Documentation of outreach efforts and collaborative events; documentation of CBO information sharing regarding upcoming events or program information updates | Community based organization and community outreach is documented in community outreach tracking document. | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Continue to work collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities.   | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Ongoing                          | Documentation of collaborative meetings, outreach, and Public Safety Partner participation  | Documentation in community outreach tracking document; documentation of meeting and participants.          | On track   | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |

| WMP Category | WMP Objective   | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification   | Explanation of Method of Verification Use   | Assessment of Completing Objective | Carried Over from Previous Compliance Years?             | Explanation for Objectives Not Met | Corrective Actions? |
|--------------|---|------------------------|----------------------------------|------------------------------|--|----------------------------------|--|---|------------------------------------|--|------------------------------------|---------------------|
|              | Continue to support bilingual outreach efforts.   | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Ongoing                          | Documentation of outreach including bilingual support  | Community based organization and community outreach is documented in community outreach tracking document.  | On track                           | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Identify improvements to overall accessibility of information available to AFN customers                      | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Ongoing                          | Documentation of customer survey feedback; Documentation of accessibility improvements as applicable                             | Liberty's AFN Plan and quarterly updates summarize improvements as applicable.  | On track                           | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Continue to encourage self-identification of AFN status through targeted outreach efforts and communications. | 10                     | WMP-CO-03                        | Section 8.5.3, pp. 360-363   | Ongoing                                | Ongoing                          | Assessment of identified AFN customer counts each quarter; Documentation of AFN Self-Id Tool content inclusion in communications | Community based organization and community outreach encouraging AFN awareness is documented in community outreach tracking document. Liberty's AFN web forms also track identification. | On track                           | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |
|              | Ongoing PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy.                   | 10                     | WMP-CO-03                        | Section 8.5.4, pp. 363-366   | Ongoing                                | Ongoing                          | Meeting notes  | Documentation in community outreach tracking document.  | On track                           | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A                                | N/A                 |

**D. Liberty's assessment of completion of 2025 WMP initiative targets listed in the tables in Section 8 of Liberty's 2023-2025 WMP.**

The required information regarding Liberty's assessment of its completion of 2025 WMP initiative targets listed in Section 8 of its 2023-2025 WMP is included in Table 4 below. Liberty provides its explanation for one missed target and associated corrective actions in Section Di. below. Additionally, as stated in Liberty's 2023-2025 WMP, Liberty did not have sufficient information to calculate the expected risk reduction percentages achieved for its WMP initiatives in 2025.

**Table 4: Assessment of Completion of 2025 WMP Initiative Targets**

| WMP Initiative Activity                           | Initiative Tracking ID | Target Units        | 2025 Target | Projected Target Completion Date | 2025 Actuals | Actual Target Completion Date | Method of Verification Explanation   | Assessment of Target Completion Based on Verification Method | Carried over from Previous Compliance Years | Assessment of QA/QC   |
|---|------------------------|---------------------|-------------|----------------------------------|--------------|-------------------------------|--|--|---|---|
| Covered conductor installation                    | WMP-GDOM-GH-01         | Circuit Miles       | 2.7         | Q4 2025                          | 3.5          | Q4 2025                       | In addition to post-work verification of projects, Liberty reports completed projects in its QDR and quarterly GIS submissions to Energy Safety. Liberty utilizes the QDR and GIS data submissions to verify accuracy and consistency in its internal asset data updates (e.g., Fulcrum and GIS) capturing grid hardening WMP initiative progress. | Exceeded target  | No  | Complete: Post-construction inspections confirmed that new construction met applicable standards and best practices in construction.  |
| Undergrounding of electric lines and/or equipment | WMP-GDOM-GH-02         | Circuit Miles       | 0.4         | Q4 2025                          | 0.3          | -                             | See response above to method of verification explanation for covered conductor initiative.   | Missed target  | No  | Complete: Post-construction inspections confirmed that new construction met applicable standards and best practices in construction.  |
| Distribution pole replacements and reinforcements | WMP-GDOM-GH-03         | Poles               | 400         | Q4 2025                          | 1038         | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative.   | Exceeded target  | No  | Complete: Post-construction inspections confirmed that new construction met applicable standards and best practices in construction.  |
| Traditional overhead hardening                    | WMP-GDOM-GH-05         | Circuit Miles       | -           | -                                | -            | -                             | See response above to method of verification explanation for covered conductor initiative.   | -  | -   | -   |
| Microgrids  | WMP-GDOM-GH-07         | Microgrids          | -           | -                                | -            | -                             | See response above to method of verification explanation for covered conductor initiative.   | -  | -   | -   |
| Installation of system automation equipment       | WMP-GDOM-GH-08         | Automatic Reclosers | 4           | Q4 2025                          | 6            | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative.   | Exceeded target  | Yes   | Ongoing: Automatic recloser installations completed as part of this initiative will be inspected as part of Liberty's asset inspection WMP initiatives and its QA/QC program for asset inspections. |
| Line removal (in HFTD)                            | WMP-GDOM-GH-09         | Circuit Miles       | -           | -                                | -            | -                             | See response above to method of verification explanation for covered conductor initiative.   | -  | -   | -   |
| Tree attachment removals                          | WMP-GDOM-GH-12a        | Tree Attachments    | 60          | Q4 2025                          | 78           | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative.   | Exceeded target  | No  | -   |
| Expulsion fuse replacement                        | WMP-GDOM-GH-12b        | Expulsion Fuses     | 500         | Q4 2025                          | 907          | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative.   | Exceeded target  | No  | Ongoing: Expulsion fuse replacements completed as part of this initiative will be   |

| WMP Initiative Activity  | Initiative Tracking ID | Target Units              | 2025 Target | Projected Target Completion Date | 2025 Actuals | Actual Target Completion Date | Method of Verification Explanation   | Assessment of Target Completion Based on Verification Method | Carried over from Previous Compliance Years | Assessment of QA/QC  |
|--|------------------------|---------------------------|-------------|----------------------------------|--------------|-------------------------------|--|--|---|--|
|  |                        |                           |             |                                  |              |                               |  |  |   | inspected as part of Liberty's asset inspection WMP initiatives and its QA/QC program for asset inspections.   |
| Animal guards  | WMP-GDOM-GH-12c        | Animal Guards             | -           | -                                | 2            | Q3 2025                       | See response above to method of verification explanation for covered conductor initiative. | Exceeded target  | Yes   | Ongoing: Animal guard installations completed as part of this initiative will be inspected as part of Liberty's substation inspection WMP initiative.  |
| Open wire/grey wire  | WMP-GDOM-GH-12e        | Circuit Miles             | 5.2         | Q4 2025                          | 9.17         | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative. | Exceeded target  | No  | Ongoing: Open wire/grey wire replacement completed as part of this initiative will be inspected as part of Liberty's asset inspection WMP initiatives and its QA/QC program for asset inspections. |
| Substation Equipment Replacement   | WMP-GDOM-GH-12f        | Substations               | 1           | Q4 2025                          | 1            | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative. | Met target   | No  | Ongoing: Substation equipment replacement completed as part of this initiative will be inspected as part of Liberty's substation inspection WMP initiative.  |
| Detailed inspections of distribution electric lines and equipment            | WMP-GDOM-AI-01         | Circuit Miles             | 260.4       | Q4 2025                          | 275.2        | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative. | Exceeded target  | No  | Complete   |
| Intrusive pole inspections   | WMP-GDOM-AI-02         | Poles                     | 2,411       | Q4 2025                          | 2,686        | Q3 2025                       | See response above to method of verification explanation for covered conductor initiative. | Exceeded target  | No  | -  |
| Patrol inspections of distribution electric lines and equipment              | WMP-GDOM-AI-01         | Circuit Miles             | 540.9       | Q4 2025                          | 585.7        | Q2 2025                       | See response above to method of verification explanation for covered conductor initiative. | Exceeded target  | No  | -  |
| Other discretionary inspections of distribution electric lines and equipment | WMP-GDOM-AI-04         | Circuit Miles             | 1.0         | Q4 2025                          | 2.24         | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative. | Exceeded target  | No  | -  |
| Quality assurance / quality control of inspections                           | WMP-GDOM-AI-05         | % of Detailed Inspections | 12%         | Q4 2025                          | 12%          | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative. | Met target   | No  | Complete   |
| Substation inspections   | WMP-GDOM-AI-06         | Substations               | 42          | Q4 2025                          | 60           | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative. | Exceeded target  | No  | -  |

| WMP Initiative Activity                                    | Initiative Tracking ID | Target Units  | 2025 Target | Projected Target Completion Date | 2025 Actuals   | Actual Target Completion Date | Method of Verification Explanation  | Assessment of Target Completion Based on Verification Method | Carried over from Previous Compliance Years | Assessment of QA/QC  |
|--|------------------------|---|-------------|----------------------------------|--|-------------------------------|---|--|---|--|
| Equipment settings to reduce wildfire risk                 | WMP-GDOM-GO-01         | # of circuits with SRP  | 7           | Q3 2025                          | 16   | Q4 2025                       | See response above to method of verification explanation for covered conductor initiative.  | Met target   | No  | -  |
| Vegetation Management Inspection Program - Detailed        | WMP-VM-INSP-01         | Circuit Miles   | 220.0       | Q4 2025                          | 227.0  | Q4 2025                       | Liberty utilizes QC of inspections, invoice review, documentation of span inspections, schedule and plan monitoring and tracking to verify.       | Exceeded target  | No  | Complete   |
| Vegetation Management Inspection Program - LiDAR           | WMP-VM-INSP-03         | Circuit Miles   | 700.0       | Q3 2025                          | 700.0  | Q3 2025                       | Liberty utilizes inspection data review to verify.  | Met target   | No  | Complete   |
| Pole Clearing  | WMP-VM-VFM-01          | Subject Poles   | 4,900       | Q4 2025                          | 5,091.0  | Q4 2025                       | Liberty utilizes post-work verification, completed work orders, invoice review, GIS pole and asset data updates, and field verification of poles. | Exceeded target  | No  | Complete   |
| Wood and Slash Management                                  | WMP-VM-VFM-02          | Acres   | 280.0       | Q4 2025                          | 387.0  | Q4 2025                       | Liberty utilizes post-work verification, completed work orders, invoice review, and load tag reports to verify                                    | Exceeded target  | No  | Complete   |
| Substation Defensible Space                                | WMP-VM-VFM-03          | Substations   | 12          | Q4 2025                          | 12   | Q2 2025                       | Post-work verification, completed work orders, invoice review   | Met target   | No  |  |
| Clearance  | WMP-VM-VFM-05          | Circuit Miles   | 700.0       | Q4 2025                          | 701.33   | Q2 2025                       | Post-work verification, completed work orders, invoice review   | Met target   | No  |  |
| Fall-In Mitigation   | WMP-VM-VFM-06          | Circuit Miles   | 220.0       | Q4 2025                          | 382.62   | Q4 2025                       | Liberty utilizes post-work verification, completed work orders, and invoice review to verify.   | Exceeded target  | No  | Complete   |
| Quality Assurance and Quality Control                      | WMP-VM-QAQC-01         | Circuit Miles   | 229.0       | Q4 2025                          | 237.5  | Q2 2025                       | Liberty utilizes QC inspection data, invoice review, and scheduling of QC activities to align with maintenance work to verify.                    | Exceeded target  | No  | Complete   |
| Grid monitoring systems                                    | WMP-SA-02              | Circuits with Fault Indicators  | 7           | Q3 2025                          | 7  | Q3 2025                       | See response above to method of verification explanation for covered conductor initiative.  | Met target   | No  | Ongoing: Fault indicator installations completed as part of this initiative will be inspected as part of Liberty's asset inspection WMP initiatives and its QA/QC program for asset inspections. |
| Collaboration and coordination with public safety partners | WMP-EP-02              | Continued engagement with local stakeholders and PSPs to prepare for and respond to fire-related event; Meet with Community Advisory Boards |             | Q4 2025                          | Engaged with stakeholders through participation in 26 events including Tahoe Fire and Fuels Team meetings, exercises, and PSP outreach. <sup>2</sup> | Q4 2025                       | Liberty utilizes a communications tracker to track all WMP outreach.  | Met target   | No  | -  |

<sup>2</sup> The entity Liberty previously identified as "Community Advisory Board" is the Tahoe Fire and Fuels Team.

| WMP Initiative Activity   | Initiative Tracking ID | Target Units  | 2025 Target | Projected Target Completion Date | 2025 Actuals  | Actual Target Completion Date | Method of Verification Explanation  | Assessment of Target Completion Based on Verification Method | Carried over from Previous Compliance Years | Assessment of QA/QC |
|---|------------------------|---|-------------|----------------------------------|---|-------------------------------|---|--|---|---------------------|
| Customer support in wildfire and PSPS emergencies   | WMP-EP-05              | Conduct annual Incident Command training for all identified IC members. Hold Tabletop (1) and Functional (1) PSPS Exercises. Continue to implement Liberty's AFN Plan. Continue maintenance of emergency response plans. Update plans and procedures based on feedback and lessons learned from stakeholders and After Action Reports (AARs). |             | Q4 2025                          | Liberty's 2025 PSPS exercise planning meetings took place on 3/27/2025 and 4/3/2025. Liberty conducted a tabletop exercise on 5/28/2025, and a full-scale exercise on 6/26/2025. Exercises and planning meetings included Cal OES, CPUC, CAL FIRE, and Office of Energy Infrastructure Safety (OEIS), along with other public safety partners, including government, critical facilities, and AFN Community advocates. IMT training was completed in Q1 of 2025 by 35 Liberty participants. | Q4 2025                       | Liberty utilizes after action reports to verify exercise and planning meetings.   | Met target   | No  | -                   |
| Public outreach and education awareness for wildfires, PSPS, outages from protective equipment and device settings, and vegetation management | WMP-CO-01              | Continue to survey customers, CBOs, community partners, and stakeholders to gauge awareness of Liberty assistance programs and of customer needs. Strengthen and expand AFN CBO partnerships.   |             | Q4 2025                          | 76 in-person meetings and events, 27 virtual events, and 70 rounds of emails, and social media posts focused on PSPS education and wildfire awareness, AFN outreach, and vegetation management. 3 direct mailings targeting AFN and Medical Baseline customers were sent in addition to 1 door hanger campaign focused on Medical Baseline customers.   | Q4 2025                       | Liberty utilizes a communications tracker to track all WMP outreach and verifies direct mail efforts through mailing documentation. | Met target   | No  | -                   |

**i. Liberty’s explanation for 2025 missed target and corrective action.**

Liberty missed one initiative target in 2025 related to the undergrounding of electric distribution lines. Specifically, Liberty completed 0.3 miles of undergrounding in 2025 compared to a target of 0.4 miles. The shortfall was primarily due to permitting delays and project re-scoping that prevented completion of the planned Tahoe Vista Rule 20 undergrounding project within the reporting year. Undergrounding projects along state highways involve complex permitting, including Caltrans right of way approvals, traffic control requirements, and coordination with multiple external agencies, which can materially affect project schedules.

Despite these challenges, Liberty successfully completed the Cave Rock undergrounding project in 2025. The Cave Rock project was considered “shovel ready,” as it did not involve the same level of permitting complexity associated with undergrounding along state highway corridors, allowing Liberty to advance construction on an accelerated timeline. Based on Liberty’s wildfire risk modeling, the completed Cave Rock undergrounding project provides greater modeled wildfire risk reduction than the originally planned Tahoe Vista Rule 20 project. The Tahoe Vista project was a Rule 20 undergrounding initiative, which is not selected based on wildfire risk reduction criteria, whereas the Cave Rock project was prioritized based on both constructability and expected wildfire risk reduction outcomes.

To address this missed target and improve future performance, Liberty is implementing the following corrective actions:

- Continued refinement and enhancement of Liberty’s wildfire risk model to better quantify and compare expected risk reduction benefits across undergrounding and other mitigation projects
- Increased reliance on the risk model to prioritize undergrounding projects for future WMP cycles, with consideration of both wildfire risk reduction and project constructability.
- Improved transparency in distinguishing Rule 20 undergrounding projects from wildfire risk-driven mitigation projects, recognizing that Rule 20 projects are primarily community-aesthetic driven and are not selected based on expected wildfire risk reduction, although they may provide ancillary wildfire risk reduction benefits.

**II. LISTING OF ALL APPROVED PETITION TO AMEND FILINGS FOR MODIFICATION OF 2025 WMP**

Liberty did not submit a Petition to Amend Filing for Modification of its 2025 WMP.

**III. 2025 WMP INITIATIVE SPEND**

Liberty's planned and actual expenditures for 2025 are included in Table 6 below.

**Table 5: Planned and Actual WMP Expenditures in 2025**

| WMP Initiative Activity   | Initiative Tracking ID | Projected Expenditures (\$) | Actual Expenditures (\$) | Explanation for Difference (if greater than 10%)   |
|---|------------------------|-----------------------------|--------------------------|--|
| Covered conductor installation                                      | WMP-GDOM-GH-01         | 7,640,200                   | 5,352,321 <sup>3</sup>   | Liberty's cost per mile for covered conductor projects in 2025 was closer to \$1,500,000 per-mile than the estimated \$2,800,000 per-mile. Several factors contribute to these lower costs. The planned spend considered cost-per-mile for recent projects in the Tahoe basin which involved more helicopter work, environmental considerations, and challenging terrain. The projects executed in 2025 included more straightforward projects, closer to main roadways with easier access for ground-based work. Liberty's engineering and contract line construction also continue to mature to obtain efficiencies in costs.  |
| Undergrounding of electric lines and/or equipment                   | WMP-GDOM-GH-02         | 9,100,000                   | 591,700                  | Liberty's \$9,100,000 estimate was for a single undergrounding project in the North Lake Tahoe area. That project included a higher cost-per-mile due to its location and complexity. However, that project was deferred due to permitting delays. Liberty had another undergrounding project in the South Lake Tahoe area in the planning stages that was not captured in its 2023-2025 WMP. That project was driven at the request of the neighborhood Home Owners Association (HOA), and included wildfire risk reduction in the HFTD-2 on a top-10 circuit. This undergrounding project included fewer miles converted, fewer highway crossings (zero), and was supported by the HOA with little required traffic control resulting in a much lower cost per mile, with less miles converted.  |
| Distribution pole replacements and reinforcements                   | WMP-GDOM-GH-03         | 5,000,000                   | 15,520,373               | Liberty exceeded its pole replacement target as it performed additional pole replacements to further reduce risk and resolve GO95 necessary repairs. Liberty's risk model has indicated that pole replacements are an efficient and effective way to reduce risk. This aligned with Liberty's subject matter experts who also identified pole replacements as an efficient and timely action to reduce risk. Minimal permitting is required and a single replaced pole can address several level 2 and 3 required repairs. Additionally, pole replacements, fuse replacements, and open wire/grey wire replacements are all part of Liberty's Resiliency Program, which aims to gain efficiencies in its grid hardening work. These three asset types are often replaced under a single work order, as the work is correlated to the same crew and truck roll, which improves efficiencies. For example, when a pole with a transformer is replaced, crews will also replace the expulsion fuse with an expulsion limiting fuse (ELF). Similarly, when crews are hardening poles, replacing cross arms, insulators, and other hardware, and encounter spans of open wire, they will replace the wire and associated hardware at the same time rather than returning separately. As a result, fuse replacement and open wire/grey wire replacement costs can be captured in Liberty's pole replacement WMP initiative. Also refer to Liberty's cost differential explanation for WMP-GDOM-GH-12b and WMP-GDOM-GH-12e. |
| Traditional overhead hardening                                      | WMP-GDOM-GH-05         | -                           | -                        |  |
| Emerging grid hardening technology installations and pilot progress | WMP-GDOM-GH-06         | -                           | -                        |  |
| Microgrids  | WMP-GDOM-GH-07         | -                           | -                        |  |
| Installation of system automation equipment                         | WMP-GDOM-GH-08         | 1,200,000                   | 268,560 <sup>4</sup>     | Liberty realized efficiencies that lowered the cost of this initiative in 2025. Liberty completed the engineering of settings in-house and hired a full-time relay technician rather than relying on contractors. Liberty also improved efficiencies in recloser pole installations — the reclosers installed in 2025 were located along major highways, which led to simpler and easier installations.  |
| Line removal (in HFTD)  | WMP-GDOM-GH-09         | -                           | -                        |  |
| Tree attachment removals  | WMP-GDOM-GH-12a        | 1,101,673                   | 1,066,696                |  |
| Expulsion fuse replacement  | WMP-GDOM-GH-12b        | 2,000,000                   | 408,290                  | Liberty completed more fuse replacements than projected (907 compared to 500) in 2025. The estimated fuse replacement cost was \$4,000 per fuse replacement. Actual fuse replacement costs in 2025 were approximately \$1,500 per fuse replacement, reflecting improved efficiencies. Of the 907 total fuse replacements, 280 fuse replacements were charged directly to this initiative. The remaining fuse replacements were replaced as part of Liberty's Resiliency Project work orders, and the associated costs — including labor and mobilization — are captured under the pole replacement initiative (WMP-GDOM-GH-03) where pole replacements, fuse replacements, and open wire/grey wire replacements are bundled into single work orders to reduce truck rolls and improve field efficiency. Refer to Liberty's cost differential explanation for WMP-GDOM-GH-03.   |

<sup>3</sup> Liberty provides revised 2025 expenditures for WMP-GDOM-GH-01 compared to its Quarter 4 2025 Quarterly Data Report, submitted on February 1, 2026. Liberty's revised 2025 spend accounts for approximately \$1,000,000 of work that was performed late in 2025 and not captured in its preliminary 2025 financial reporting.

<sup>4</sup> Liberty's provides revised 2025 expenditures for WMP-GDOM-GH-08 and WMP-GDOM-GO-01 compared to its Quarter 4 2025 Quarterly Data Report, submitted on February 1, 2026. Liberty's 2025 expenditures for SRP implementation, including automatic recloser installations, were originally captured in a single WMP initiative (WMP-GDOM-GH-08). Liberty has since separated the costs for equipment settings work (WMP-GDOM-GO-01) to more accurately reflect spend by WMP initiative, resulting in \$268,560 for automatic recloser installations and \$712,000 equipment settings work.

| WMP Initiative Activity  | Initiative Tracking ID | Projected Expenditures (\$) | Actual Expenditures (\$) | Explanation for Difference (if greater than 10%)   |
|--|------------------------|-----------------------------|--------------------------|--|
| Animal guards  | WMP-GDOM-GH-12c        | -                           | 117,897 <sup>5</sup>     | Liberty completed two animal guard installations in 2025 that were originally planned for 2024 but delayed due to weather. The associated costs of \$117,897 in 2025 were not projected for 2025.  |
| Open wire/grey wire  | WMP-GDOM-GH-12e        | 3,000,000                   | 1,581,297                | Liberty completed more open wire/grey wire replacement than projected (9.17 miles vs. 5.2 miles) in 2025. The cost per mile was lower than projected as Liberty gained efficiencies by performing this work towards the start of the year in the offseason when there are not as many seasonal demands on Liberty crews. Additionally, some open wire/grey wire was replaced as part of Liberty's Resiliency Project work orders, and the associated costs — including labor and mobilization — are captured under the pole replacement initiative (WMP-GDOM-GH-03) where pole replacements, fuse replacements, and open wire/grey wire replacements are bundled into single work orders to reduce truck rolls and improve field efficiency. Refer to Liberty's cost differential explanation for WMP-GDOM-GH-03 |
| Substation equipment replacement   | WMP-GDOM-GH-12f        | 607,584                     | 225,212                  | Liberty realized cost savings by hiring an internal employee within the substation group. Some of the work that would have previously required contractors was able to be performed in house. Additionally, there were other unplanned substation projects that were completed during the year but were not tracked in this initiative.  |
| Detailed inspections of distribution electric lines and equipment            | WMP-GDOM-AI-01         | 500,000                     | 1,871,800                | Liberty's projected expenditures for 2025 were based on its optimized detailed asset inspection schedule, established after its 2025 WMP Update submission. Liberty devoted additional resources to complete the delta (approximately 90 miles) between its optimized detailed asset inspection schedule and the detailed asset inspection schedule targeted in its 2023-2025 WMP. Additionally, Liberty captured 2025 other discretionary asset inspection costs and 2025 QA/QC asset inspection costs in this initiative.  |
| Intrusive pole inspections   | WMP-GDOM-AI-02         | 175,000                     | 159,723 <sup>6</sup>     |  |
| Patrol inspections of distribution electric lines and equipment              | WMP-GDOM-AI-03         | 150,000                     | 72,932                   | Liberty realized efficiencies that lowered the cost of this initiative. For example, Liberty initially estimated that it would need two days per helicopter inspection, however, Liberty was able to complete each helicopter inspection in one day.   |
| Other discretionary inspections of distribution electric lines and equipment | WMP-GDOM-AI-04         | 150,000                     | -                        | The 2025 costs for this initiative were tracked with the same WBS cost code as Liberty's detailed asset inspection initiative. Refer to WMP-GDOM-AI-01.  |
| Quality assurance / quality control of inspections                           | WMP-GDOM-AI-05         | 30,000                      | -                        | The 2025 costs for this initiative were tracked with the same WBS cost code as Liberty's detailed asset inspection initiative. Refer to WMP-GDOM-AI-01.  |
| Substation inspections   | WMP-GDOM-AI-06         | 45,000                      | -                        | Liberty did not track 2025 costs separately for this initiative. Costs were capture in other Operation and Maintenance WBS cost codes. In 2026, Liberty plans to open individual work orders for substation inspections so that the costs of this initiative can be tracked separately.  |
| Equipment maintenance and repair   | WMP-GDOM-MR-01         | 500,000                     | -                        | Liberty did not track 2025 costs separately for this initiative. Most of Liberty's maintenance activities were tracked in a single WBS code which did not allow the costs to be isolated.  |
| Equipment settings to reduce wildfire risk                                   | WMP-GDOM-GO-01         | 500,000                     | 712,000 <sup>7</sup>     | Liberty planned to implement sensitive relay profiles on seven feeders in 2025 and exceeded this plan by implementing sensitive relay profiles on 16 feeders to complete its initial implementation of the program. Liberty's projected expenditures reflected using contractor labor for engineering and relay technicians. However, Liberty was able to onboard, train, and utilize internal staff to complete this work, which is reflected in the overall cost efficiency.   |
| Personnel work procedures and training in conditions of elevated fire risk   | WMP-GDOM-GO-03         | 5,000                       | -                        | Liberty did not incur the expenditures projected for this initiative in 2025.  |
| Vegetation Management Inspection Program - Detailed                          | WMP-VM-INSP-01         | 917,841                     | 878,696                  |  |
| Vegetation Management Inspection Program - Patrol                            | WMP-VM-INSP-02         | 330,173                     | 185,312                  | Liberty over-forecasted costs for this initiative in 2025.   |

<sup>5</sup> Liberty provides revised 2025 expenditures for WMP-GDOM-GH-12c compared to its Quarter 4 2025 Quarterly Data Report, submitted on February 1, 2026. Liberty's preliminary 2025 financial reporting for WMP-GDOM-GH-12c inadvertently did not include \$117,897 in costs for animal guard installations.

<sup>6</sup> Liberty provides revised 2025 expenditures for WMP-GDOM-AI-02 compared to its Quarter 4 2025 Quarterly Data Report, submitted on February 1, 2026. Liberty's preliminary 2025 financial reporting of \$466,317 for WMP-GDOM-AI-02 inadvertently included pole replacement costs with the inspection costs. The revised actual of \$159,723 reflects intrusive inspection costs only, which aligns with Liberty's projected expenditures.

<sup>7</sup> Liberty's provides revised 2025 expenditures for WMP-GDOM-GH-08 and WMP-GDOM-GO-01 compared to its Quarter 4 2025 Quarterly Data Report, submitted on February 1, 2026. Liberty's 2025 expenditures for SRP implementation, including automatic recloser installations, were originally captured in a single WMP initiative (WMP-GDOM-GH-08). Liberty has since separated the costs for equipment settings work (WMP-GDOM-GO-01) to more accurately reflect spend by WMP initiative, resulting in \$268,560 for automatic recloser installations and \$712,000 equipment settings work.

| WMP Initiative Activity   | Initiative Tracking ID | Projected Expenditures (\$) | Actual Expenditures (\$) | Explanation for Difference (if greater than 10%)   |
|---|------------------------|-----------------------------|--------------------------|--|
| Vegetation Management Inspection Program - LiDAR  | WMP-VM-INSP-03         | 735,488                     | 598,552                  | Liberty over-forecasted costs for this initiative in 2025. Liberty worked with its vendor to realize cost savings through year-over-year improved efficiency. Liberty reflected this in its internal re-forecasting of this initiatives costs in mid-2025 (updated forecast was \$600,000).  |
| Pole Clearing   | WMP-VM-VFM-01          | 453,918                     | 526,107                  | Liberty under-forecasted costs for this initiative in 2025.  |
| Wood and Slash Management   | WMP-VM-VFM-02          | 1,381,311                   | 1,111,614                | Liberty over-forecasted cost for this initiative in 2025. Liberty re-forecasted this initiatives costs in mid-2025 (updated forecast was \$1,070,000).   |
| Substation Defensible Space   | WMP-VM-VFM-03          | 84,365                      | 38,437                   | Liberty over-forecasted costs this initiative in 2025. Liberty re-forecasted this initiatives costs in mid-2025 (updated forecast was \$40,000).   |
| Fire-Resilient Right-of-Ways  | WMP-VM-VFM-04          | 577,360                     | 1,446,841                | In 2025, Liberty workload for this initiative increased due to overlap in regions with planned Fall-In Mitigation activities. Work orders in the overlap area were reclassified to Fire-Resilient ROW, and associated funding was shifted from the Fall-In Mitigation budget (WMP-VM-VFM-06) to support the increased workload.  |
| Clearance   | WMP-VM-VFM-05          | 1,405,502                   | 1,766,163                | Liberty experienced poor production and work efficiency with one tree vendor in 2025, resulting in increased costs. As a result, Liberty discontinued work with this vendor in Quarter 2 of 2025. Liberty also expanded the scope of this initiative in in 2025 to include clearing around padmount transformer equipment.   |
| Fall-In Mitigation  | WMP-VM-VFM-06          | 4,810,059                   | 3,063,097                | Liberty over-forecasted costs for this initiative in 2025. Liberty reallocated costs from this initiative to Fire-Resilient Right-of-Ways (WMP-VM-VFM-04) and re-forecasted this initiatives costs in mid-2025 (updated forecast was \$3,700,000).   |
| Emergency response vegetation management  | WMP-VM-VFN-08          | -                           | 10,365                   | Liberty did not forecast any 2025 costs for Emergency Vegetation Management.   |
| Vegetation Management Enterprise System   | WMP-VM-ESG-01          | 843,648                     | 493,606                  | Liberty over-forecasted costs for this initiative in 2025.   |
| Quality Assurance and Quality Control   | WMP-VM-QAQC-01         | 540,791                     | 543,393                  |  |
| Environmental monitoring systems  | WMP-SA-01              | 50,000                      | 199,195                  | Forecasted costs for this initiative were initially projected for Liberty's weather station maintenance and calibration program. Additional costs were due to purchasing spare parts for weather station repairs, weather station data plan and support services, as well as fuel moisture sampling costs that were not included in the initial projections.   |
| Grid monitoring systems   | WMP-SA-02              | 300,000                     | -                        | Liberty forecasted 2025 costs for grid monitoring installations based on contracted labor and engineering costs. Liberty installed grid monitoring on eight circuits and performed all of this work in-house, continuing to improve efficiencies in designing and installing these devices. The associated costs for grid monitoring systems are captured in Liberty's Equipment Settings to Reduce Wildfire Risk initiative (WMP-GDOM-GO-01). |
| Fire detection and alarm systems  | WMP-SA-03              | -                           | 126,000                  | Costs for this initiative are for wildfire detection cameras (AlertWildfire) that were not included in 2025 projected costs.   |
| Weather forecasting   | WMP-SA-04              | -                           | 276,655                  | Actual costs exceeded projected costs for this category due to internal labor and overhead costs that were not included in initial projections for 2025.   |
| Ignition likelihood calculation   | WMP-SA-06              | 806,000                     | 1,272,699                | Risk modeling actual expenditures exceeded projections due to additional professional services required to expand modeling capabilities in response to updated Wildfire Mitigation Plan (WMP) guidelines. Additional costs were also incurred to support Liberty's responses to data requests and to develop supplemental analyses required by the WMP Revision Notice.  |
| Wildfire and PSPS emergency preparedness plan   | WMP-EP-01              | 35,000                      | -                        | Costs projected for this initiative were applied to WMP-EP-04.   |
| Preparedness and planning for service restoration   | WMP-EP-04              | 225,000                     | 479,763                  | Actual costs exceeded projected costs for this initiative due to internal labor and overhead costs that were not included in initial projections for 2025.   |
| Customer support in wildfire and PSPS emergencies   | WMP-EP-05              | 55,000                      | 98,625                   | Actual expenditures exceeded projections due to costs associated with late-season PSPS events that occurred in 2024 but were invoiced in 2025 and not accrued in 2024. As a result, these expenses were recorded in 2025.  |
| Public outreach and education awareness for wildfires, PSPS, outages from protective equipment and device settings, and vegetation management | WMP-CO-01              | 90,000                      | 174,515                  | Liberty tracked and reported internal labor costs supporting engagement with Community Based Organizations (CBOs) that were not included in its projected expenditures.  |

#### IV. CONCLUSION

Liberty appreciates this opportunity to provide this 2025 WMP Annual Implementation Report and looks forward to working with Energy Safety and other stakeholders to advance Liberty's wildfire mitigation planning efforts.

Respectfully submitted,

*/s/ Jordan Parrillo*

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