| Leath Undertaile C (22 (2022 | | | | Liberty 2023 WMP Discovery Log | | | | | | | | |
|------------------------------|------------------------------------|--------------------------|--|--|-------------------------|---------------|----------------|--|--|------------------------------------|--|--------------|
| Count Party Name | DR Set # Data Request | Question No. Question ID | Question Please provide a copy of each WMP-related document, submission, or report you submit to the | Responses Refer to attachment: "2023-03-06_Liberty_2023_WMP-RO" for Liberty's 2023 WMP pre- | • | Date Received | Final Date Due | Date Sent Links Nu | nber of Attachements Attachment Links NDA Required | WMP Sectio | n Category | Subcategory |
| | | | Office of Energy Infrastructure Safety (Energy Safety) in 2023 that is related to your WMP. Provide the copy to Cal Advocates within one business day of the document's submittal to Energy Safety. (If you have submitted the document to Energy Safety in 2023 prior to this data request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this data request.) This request is limited to materials or documents that (1) are related to work plans, initiative targets, risk models, risk spend efficiency (RSE) calculations, or WMP change orders; and (2) are provided to Energy Safety to provide additional details or | | | | N/A | | 1 | | | |
| CalAdvocates | 1 CalAdvocates-Liberty-2023WMP-01 | 1 CalAdv-01-1.1 | | Defende attack we get #2022-02-06 Liberty 2022 MAAD DO Dublis # femiliberty / 2022 MAA | Aaron Louie | 2/24/2023 | | 3/8/2023 Response 03082023.pdf (libertyutilities.com) | | WMP Pre- Submission | Administrative | N/A |
| CalAdvocates | 1 CalAdvocates-Liberty-2023WMP-01 | 2 CalAdv-01-1.2 | Please provide a copy of your WMP pre-submission within two business days of its submission to Energy Safety. Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Report and submitted to Energy Safety (including but not limited to all PDFs, spatial data files, non-spatial data files, and confidential attachments) on the same business day that the document is | pre-submission. Liberty attempted to provide CalAdvocates with copies of its Q4 2022 QDR files on February 1, 2023. However, due to technical issues with the CPUC Kiteworks platform, | Aaron Louie | 2/24/2023 | N/A N/A | CalAdvocates-Liberty-2023WMP-01_Liberty 3/8/2023 Response 03082023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-01_Liberty | 1 | WMP Pre- Submission WMP Pre- | Administrative | N/A |
| CalAdvocates | 1 CalAdvocates-Liberty-2023WMP-01 | 3 CalAdv-01-1.3 | Provide a copy of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the issuer of the discovery request. This includes: a) Confidential responses to WMP discovery requests issued by Energy Safety. b) Confidential | Liberty will provide CalAdvocates with copies of responses to 2023 WMP discovery requests made by Energy Safety and other entities. | Aaron Louie | 2/24/2023 | N/A | 3/8/2023 Response 03082023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-01_Liberty | | Submission WMP Pre- | Administrative | N/A |
| CalAdvacatos | 1 CalAdvocates-Liberty-2023WMP-01 | 4 CalAdv-01-1.4 | Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that were completed since January 1, 2022, and that examined any programs, initiatives, or strategies described in your 2022 WMP Update. | For Vegetation Management programs, Liberty performs a post-work documentation review, or desktop review, of 100% of vegetation management invoices in order to confirm accuracy. If satisfactory, the invoices are approved in Liberty's work management system. If not satisfactory, the invoice and supporting documents are returned to the contractor for correction. The following file related to Liberty's Post-Work Verification Procedure ("PWVP") desktop review is included in the Supporting Materials email for this data request response sent to CalAdvocates through the CPUC Kiteworks system: "2022 Liberty Internal Desktop Invoice Audit Tracker." Additionally, Liberty system arborists perform post-work field validations to confirm adherence to work specifications. This includes a review to determine whether (1) adequate clearances were achieved, (2) slash and debris removal was satisfactory, (3) the inventory of the work is accurate, and (4) pruning was completed per ANSI standards. Work that is determined to be unsatisfactor is reported to the contractor to be corrected. Liberty provided additional information regarding its vegetation management QA/QC procedures in Section 8.2.5 of its 2023 WMF pre-submission. Liberty is in the process of collecting QA/QC materials completed as part of its asset inspections QA/QC program in 2022. Liberty plans to provide this information to CalAdvocates by March 17, 2023. | s n ry P t | 2/24/2023 | 2/10/2022 | 2/10/2023 Response 03082023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-02 Liberty 2/10/2023 Response 03103033 pdf (libertyutilities.com) | | Submission | Grid Design, operations, and maintenance (8.1). Vegetation | N/A |
| CalAdvocates | 2 CalAdvocates-Liberty-2023WMP-02 | 1 CalAdv-02-2.1 | Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by external entities that were completed since January 1, 2022, and that examined any programs, initiatives, or strategies described in your 2022 WMP Update. External entities include, but are not limited to, consultants, contractors, auditors, court-appointed monitors, and Independent Evaluators. | Refer to the following vegetation management files and folders in the Supporting Materials email for this data request response sent to CalAdvocates through the CPUC Kiteworks system: • 2022_VM_QC_Pass_Results_Report.xlsx • TAH7300_LiDAR_Work_QC_Corrective_Action.xlsx • QC of Completed Work folder • QC of Inspections folder Liberty is in the process of collecting QA/QC materials completed as part of its asset inspections QA/QC program in 2022. Liberty plans to provide this information to CalAdvocates by March 17, 2023. • QC of Pole Clearing folder | Aaron Louie | 2/24/2023 | 3/10/2023 | 3/10/2023 Response_03102023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-02 Liberty | 6 | 8 | Grid Design, operations, and maintenance (8.1). Vegetation | 8.1.6, 8.2.5 |
| CalAdvocates | 2 CalAdvocates-Liberty-2023WMP-02 | 2 CalAdv-02-2.2 | Provide an Excel table of all defects in the year 2022 found by Energy Safety's Compliance | Dead tree audit 7_22 folder Liberty did not receive any Notices of Defects from Energy Safety in 2022. | Aaron Louie | 2/24/2023 | 3/10/2023 | 3/10/2023 Response 03102023.pdf (libertyutilities.com) | | 8 | Management (8.2) | 8.1.6, 8.2.5 |
| CalAdvocates | 2 CalAdvocates-Liberty-2023WMP-02 | 3 CalAdv-02-2.3 | Branch (as rows) that includes the following information in separate columns. a) Associated circuit name b) Defect type c) Description of defect d) 2022 WMP initiative (from your 2022 WMP update) associated with defect e) Date that the defect was identified f) Date that the defect was corrected g) If the defect has not yet been corrected as of the issuance date of this data request, a brief explanation. h) Priority level of corresponding corrective tag i) Geographic latitude of defect in decimal degrees, truncated to seven decimal places j) Geographic longitude of defect in decimal degrees, truncated to seven decimal places. Provide an Excel table of all violations in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns. a) Associated circuit name b) Violation type c) Description of violation d) 2022 WMP initiative (from your 2022 WMP update) associated with violation e) Date that the violation was identified f) Date that the violation was corrected | Liberty did not receive any Notices of Violations from Energy Safety in 2022. | Aaron Louie | 2/24/2023 | 3/10/2023 | CalAdvocates-Liberty-2023WMP-02_Liberty 3/10/2023 Response 03102023.pdf (libertyutilities.com) | | 12 | Notices of Violation and Defect | N/A |
| Cal Advocates | 2 CalAdvocates-Liberty-2023WMP-02 | 4 CalAdv-02-2.4 | g) If the violation has not yet been corrected as of the issuance date of this data request, a brie explanation h) Priority level of corresponding corrective tag i) Geographic latitude of violation in decimal degrees, truncated to seven decimal places j) Geographic longitude of violation in decimal degrees, truncated to seven decimal places. | | Aaron Louie | 2/24/2023 | 3/10/2023 | CalAdvocates-Liberty-2023WMP-02 Liberty 3/10/2023 Response_03102023.pdf (libertyutilities.com) | | 12 | Notices of Violation and Defect | N/A |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 1 CalAdv-03-3.1 | Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns. a) Circuit name b) Circuit ID number c) Total circuit miles of Circuit miles in Other HFTD dreas e) Circuit miles in Other HFTD dreas e) Circuit miles in Other HFTD dreas e) Circuit miles in Other HFTD Tier 2 g) Circuit miles in HFTD Tier 2 g) Circuit miles in HFTD Tier 3 h) Circuit sollo (System Average Interruption Duration Index) for 2021 j) Circuit SAID (System Average Interruption Duration Index) for 2022 g) Circuit SAID (System Average Interruption Frequency Index) for 2021 j) Circuit SAIF (System Average Interruption Frequency Index) for 2021 j) Circuit SAIF (System Average Interruption Frequency Index) for 2021 jn) Circuit SAIF (System Average Interruption Frequency Index) for 2021 jn) Circuit MAIF (Momentary Average Interruption Frequency Index) for 2022 jn) Circuit SAIF (System Average Interruption Frequency Index) for 2022 jn) Circuit SAIF (System Average Interruption Frequency Index) for 2022 jn) Circuit SAIF (System Average Interruption Frequency Index) for 2022 jn) Circuit SAIF (System Average Interruption Frequency Index) for 2022 jn) Circuit SAIF (System Systems) Average Interruption Frequency Index) for 2022 jn) Circuit SAIF (System Systems) Average Interruption Frequency Index) for 2022 jn) Circuit SAIF (System Systems) Average Interruption Frequency Index) for 2022 jn) Circuit SAIF (System Systems) Average Interruption Frequency Index) for 2022 jn) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. jn) Number of trees that were worked on for EVM in Non-HFTD in 2021 jn) Number of trees that were worked on for EVM in HFTD Tier 2 in 2022 jn) Number of trees that were worked on for EVM in HFTD Tier 2 in 2022 jn) Number of trees that were worked on for EVM in HFTD Tier 2 in 2022 jn) Number of trees that were worked on for EVM in HFTD Tier 2 in 2022 jn) Number of Support Structures Frejaced in Men HFTD In 2 | Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Question 1-4," Tab Q2 – Transmission. | Aaron Louie Aaron Louie | 2/24/2023 | 3/24/2023 | CalAdvocates-Liberty-2023WMP-03 Liberty 3/29/2023 Response 03292023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-03 Liberty 3/29/2023 Response 03292023.pdf (libertyutilities.com) | 1 | 5, 6 | Electrical Infrastructure Electrical Infrastructure | 5.2, 6.4.2 |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 2 CalAdv-03-3.2 | y) Miles of LiDAR inspection in HFTD Tier 2 in 2021 Provide an Excel table of all distribution circuits existing as of January 1, 2022, that were removed or decommissioned in 2022, either partially or entirely (as rows). This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns. a) Circuit name | Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Question 1-4," Tab Q3 — Distribution Removals. | | 2/24/2023 | 3/24/2023 | 3/29/2023 Response_03292023.pdf (libertyutilities.com) | | 5, 6 | Electrical Infrastructure | 5.2, 6.4.3 |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 2 | b) Circuit ID number c) Circuit miles removed or decommissioned in Non-HFTD Areas d) Circuit miles removed or decommissioned in Other HFTD e) Circuit miles removed or decommissioned in HFTD Tier 2 f) Circuit miles removed or decommissioned in HFTD Tier 3 | | Aaron Louis | 2/24/2022 | 2/24/2022 | CalAdvocates-Liberty-2023WMP-03_Liberty 3/29/2023 Response_03292023 pdf (libertyutilities.com) | 1 | | Line Removal | 9120 |
| CaiAdvocates | 5 CalAuvocates-Liberty-2023WIMP-03 | 3 CalAdv-03-3.3 | Provide an Excel table of all transmission circuits existing as of January 1, 2022, that were removed or decommissioned in 2022, either partially or entirely (as rows). This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns. a) Circuit name b) Circuit ID number c) Circuit miles removed or decommissioned in Non-HFTD Areas d) Circuit miles removed or decommissioned in Other HFTD e) Circuit miles removed or decommissioned in HFTD Tier 2 | Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Question 1-4," Tab Q4 – Transmission Removals. | Aaron Louie | 2/24/2023 | 5/24/2023 | 3/29/2023 Response_03292023.pdf (libertyutilities.com) | 1 | 8 | LITE REITIOVAL | 8.1.2.9 |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 4 CalAdv-03-3.4 | f) Circuit miles removed or decommissioned in HFTD Tier 3 g) Reason(s) for removal or decommissioning. | | Aaron Louie | 2/24/2023 | 3/24/2023 | CalAdvocates-Liberty-2023WMP-03_Liberty 3/29/2023 Response 03292023.pdf (libertyutilities.com) | | 8 | Line removal | 8.1.2.9 |

| | | | | For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced where you performed work in 2022. a) Vegetation Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2022. Work performed in 2022 was planned | | |
|----------------------------|---|----------|---------------|--|----------------|--|
| | | | | management (VM) b) Covered conductor installation Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For | | |
| | | | | d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets additional information, refer to Section 6.7, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. | | |
| | | | | g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets | | |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 5 | CalAdv-03-3.5 | i) Aerial inspections of transmission assets j) LiDAR inspections of distribution assets k) LiDAR inspections of transmission assets. Aaron Louie 2/24/2023 3/29/2023 Response 03292023.pdf (libertyutilities.com) | 6 | Risk Scoring N/A |
| Culrid Vocates | S Canadocates Liberty 2025Willi 05 | <u> </u> | | For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced how work in 2022 was sequenced. a) VM Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2022. Work performed in 2022 was planned | | MISK SCOTTING 14/14 |
| | | | | b) Covered conductor installation using separate risk analysis, compliance requirements, and/or subject matter expertise. c) Undergrounding d) Distribution pole replacement circuit segment level to plan and prioritize how future work is sequenced in 2024. For | | |
| | | | | e) Grid sectionalization additional information, refer to Section 6.7, Section 7.1.4, and individual f) Detailed inspections of distribution assets initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. | | |
| | | | | g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets | | |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 6 | | j) LiDAR inspections of distribution assets k) LiDAR inspections of transmission assets. Aaron Louie Z/24/2023 Aaron Louie Z/24/2023 Z/29/2023 Z | 6 | Risk Scoring N/A |
| | | | | each circuit or circuit-segment influence where you plan to perform work in 2023. a) VM b) Covered conductor installation that influenced where it performed work in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. | | |
| | | | | c) Undergrounding d) Distribution pole replacement e) Grid sectionalization Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 7.1.3, Section 7.1.4, and individual | | |
| | | | | f) Detailed inspections of distribution assetsg) Detailed inspections of transmission assets h) Aerial inspections of transmission assets i) Aerial inspections of transmission assets | | |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 7 | CalAdv-03-3.7 | j) LiDAR inspections of distribution assets k) LiDAR inspections of transmission assets. CalAdvocates-Liberty-2023WMP-03 Liberty Aaron Louie 2/24/2023 3/29/2023 Response 03292023.pdf (libertyutilities.com) | 6 | Risk Scoring N/A |
| | | | | For each WMP initiative listed below, please state which and how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2023 will be sequenced. a) VM b) Covered conductor installation Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. | | |
| | | | | c) Undergrounding d) Distribution pole replacement Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For | | |
| | | | | e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets g) Detailed inspections of transmission assets | | |
| | | | | h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LiDAR inspections of distribution assets | | |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 8 | CalAdv-03-3.8 | k) LiDAR inspections of transmission assets. Aaron Louie CalAdvocates-Liberty-2023WMP-03 Liberty Aaron Louie CalAdvocates-Liberty-2023WMP-03 Liberty Response 03292023.pdf (libertyutilities.com) | 6 | Risk Scoring N/A |
| | | | | For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2024. a) VM circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 7.1.3, Section 7.1.4, and individual | | |
| | | | | c) Undergrounding d) Distribution pole replacement e) Grid sectionalization | | |
| | | | | f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets | | |
| | | | | h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LiDAR inspections of distribution assets CalAdvocates-Liberty-2023WMP-03 Liberty | | |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 9 | | k) LiDAR inspections of transmission. For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2024 will be sequenced. a) VM Aaron Louie 2/24/2023 3/29/2023 3/29/2023 3/29/2023 3/29/2023 3/29/2023 3/29/2023 3/29/2023 3/29/2023 Aaron Louie 2/24/2023 3/29/2023 3/29/2023 Aaron Louie 2/24/2023 3/2 | 6 | Risk Scoring N/A |
| | | | | b) Covered conductor installation additional information, refer to Section 7.1.3, Section 7.1.4, and individual c) Undergrounding initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. | | |
| | | | | d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets | | |
| | | | | g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets CalAdvocates-Liberty-2023WMP-03_Liberty | | |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 10 | | j) LiDAR inspections of distribution assets k) LiDAR inspections of transmission assets. Aaron Louie 2/24/2023 3/29/2023 Response_03292023.pdf (libertyutilities.com) Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions | 6 | Risk Scoring N/A |
| | | | | times actual capital expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP 1 4," Tab Response 1. | | |
| CalAdvocates | 4 CalAdvocates-Liberty-2023WMP-04 | 1 | | c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase. CalAdvocates-Liberty-2023WMP-04_Liberty CalAdvocates-Liberty-2023WMP-04_Liberty Aaron Louie 2/24/2023 3/31/2023 Response 03312023.pdf (libertyutilities.com) | WMP Financials | N/A N/A |
| | | | | For each WMP initiative for which you forecast capital expenditures in 2024 to be at least two times actual capital expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 2. | | |
| | | | | b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update | | |
| CalAdvocates | 4 CalAdvocates-Liberty-2023WMP-04 | 2 | CalAdv-04-4.2 | d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase. CalAdvocates-Liberty-2023WMP-04_Liberty | WMP Financials | N/A N/A |
| | | | | two times actual operating expenditures in 2022, please provide: a) The name of the initiative as l-4," Tab Response 3. it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP | | |
| | | | | c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update CalAdvocates-Liberty-2023WMP-04 Liberty | | |
| CalAdvocates | 4 CalAdvocates-Liberty-2023WMP-04 | 3 | | e) An explanation for the projected increase. For each WMP initiative for which you forecast operating expenditures in 2024 to be at least two times actual operating expenditures in 2022, please provide: a) The name of the initiative as 1-4," Tab Response 4. Aaron Louie 2/24/2023 3/31/2023 3/31/2023 3/31/2023 3/31/2023 3/31/2023 3/31/2023 3/31/2023 3/31/2023 3/31/2023 3/31/2023 4/////////////////////////////////// | WMP Financials | N/A N/A |
| | | | | it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP 1 the name of the initiative as it is identified in your 2022 WMP Update | | |
| CalAdvocates | 4 CalAdvocates-Liberty-2023WMP-04 | 4 | CalAdv-04-4.4 | d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase. CalAdvocates-Liberty-2023WMP-04_Liberty Aaron Louie 2/24/2023 2/4/2023 3/24/2023 4/10/2023 Response 03312023.pdf (libertyutilities.com) | WMP Financials | N/A N/A |
| | | | | a) As of January 1, 2022, have you identified transportation corridors within your service territory where falling or failing lines or poles could currently limit egress and/or ingress during an emergency? b) If the answer to part (a) is yes, please describe how you identify such | | |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 1 | CalAdv-05-5.1 | transportation corridors. c) If available, please provide a geospatial data file that contains all current identified transportation corridors with ingress and egress hazards. Provide an Excel table of all distribution circuit-segments that traverse HFTD areas (i.e., the Provide an Excel table of all distribution circuit-segments that traverse HFTD areas (i.e., the Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question" CalAdvocates-Liberty-2023WMP-05_Liberty | 6 | N/A N/A |
| | | | | segment has greater than zero circuit-miles in HFTD) existing as of January 1, 2023. The Excel table should list each such circuit-segment as a row and include the following information in | | |
| | | | | separate columns. For items (n) and (r), please include all relevant risk scores. For example, include vegetation risk score, conductor risk score, and any other driver-specific risk scores you have developed. Please insert additional columns as needed to accommodate this. a) Name or | | |
| | | | | ID number of each circuit segment b) Circuit name for the circuit that each segment is part of c) Circuit ID for the circuit that each segment is part of | | |
| | | | | d) Nominal voltage e) Total circuit-miles on the circuit-segment | | |
| | | | | f) Overhead circuit-miles on the circuit-segment in non-HFTD Areas g) Overhead circuit-miles on the circuit-segment in HFTD Tier 2 h) Overhead circuit-miles on the circuit-segment in HFTD Tier 3 | | |
| | | | | i) Underground circuit-miles on the circuit-segment in non-HFTD Areas j) Underground circuit-miles on the circuit-segment in HFTD Tier 2 k) Underground circuit-miles on the circuit-segment in HFTD Tier 3 | | |
| | | | | I) Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing | | |
| | | | | m) Consequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing n) Total wildfire risk score(s) for the circuit-segment, according to the risk model you used for | | |
| | | | | your 2022 WMP filing. Insert additional columns if needed o) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you used for your 2022 WMP filing | | |
| | | | | p) Probability of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing CalAdvocates-Liberty-2023WMP-05_Liberty | | |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 2 | cumav os s.z | q) Consequence of ignition score for the circuit-segment, according to the risk model you are Provide a geodatabase file containing the outputs from your current wildfire risk model (i.e., the model you are using for your 2023-2025 WMP filing), at the circuit-segment level. (This data Aaron Louie 2/24/2023 3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com) by desponse 04102023.pdf (libertyutilities.com) and of the 2023-2025 WMP pre-submission at the circuit-segment level. | 6 | IN/A N/A |
| | | | | should be equivalent to the previous question, but in GIS format.) Please provide, as line features, the most recent spatial data for all circuit segments for which your current risk model calculates circuit segment-level expected risk (i.e., probability of ignition multiplied by the | | |
| | E Colledus and a Ul | 2 | | consequence of ignition). Include the following attributes for each circuit segment: a) Items (a) through (c) of the previous question CalAdvocates-Liberty-2023WMP-05_Liberty | | NI/A |
| CalAdvocates CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 5 CalAdvocates-Liberty-2023WMP-05 | 4 | | b) Items (p) through (s) of the previous question. Please fill out the attached spreadsheet, CalAdvocates-Liberty-2023WMP-05_Attachment Tab 1, requesting information regarding your asset inspections in 2022. Aaron Louie 2/24/2023 3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-05_Liberty Aaron Louie 2/24/2023 3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com) Aaron Louie 2/24/2023 3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com) | 8 | N/A N/A Grid Design, operations, and maintenance (8.1) 8.1.6 |
| | | | | In response to Data Request CalAdvocates-Liberty-2022WMP-06, Question 7, March 24, 2022, Liberty stated, "Liberty's QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of inspect 0.5% of its 2022 detailed inspections, equating to 27 re-inspections. Of these, 24 | | |
| | | | | 2022 after Quarter 1 and Quarter 2 detailed inspections are completed." a) Did Liberty were completed and three locations were inaccessible at the time of re-inspection due to snow, equating to 0.44% re-inspected. Refer to supporting file: "CalAdvocates-Liberty-" | | |
| | | | | the quote above? b) Please summarize the results of Liberty's asset inspection QA/QC reviews in 2022. c) Did Liberty's asset inspection QA/QC reviews in 2022 lead to any corrective actions or b) 2023WMP-05_Liberty Response Question 5 and 6." c) No. The QA/QC reviews showed that there are some inconsistencies among inspectors, but the significant issues were captured by both inspections. | | |
| | | | | improvements, such as performing re-inspections of certain assets, revising inspection protocols, or changing training for inspectors? d) None. e) Minor inconsistencies among inspections are to be expected. Since major issues were | | |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 5 | | d) If the answer to part (c) is yes, please describe the actions that Liberty is taking as a result of its asset inspection QA/QC reviews. e) If the answer to part (c) is no, please explain why not. Aaron Louie 2/24/2023 3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com) | 8 | Grid Design, operations, and maintenance (8.1) 8.1.6 |
| | | | | In response to Data Request CalAdvocates-Liberty-2022WMP-06, Question 7, March 24, 2022, Liberty stated "Liberty's QA/QC processes for asset inspections were developed for inspection in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of o5_Liberty Response Question 6a." a) Liberty completed one Program Manager Review Acknowledgement form for 2022 asset inspection for 2022 asset inspection QA/QC activities. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 6a." | | |
| | | | | 2022 after Quarter 1 and Quarter 2 detailed inspections are completed." The following questions b) Liberty completed one Senior Manager Annual Review Acknowledgement form for 2022 refer to the QA/QC processes for asset inspections that Liberty implemented in Quarter 3 and asset inspection QA/QC activities. Refer to supporting file: "CalAdvocates-Liberty- | | |
| | | | | Quarter 4 of 2022: a) Please provide a sample of 5 completed "Appendix A – Program Manager Question 6b." Quarterly Review Acknowledgment" forms. b) Please provide a sample of 5 completed "Appendix B – Senior Manager Annual Review 2023WMP-05_Liberty Response Question 6b." 5 and 6." This file captures the information from the third party QA/QC inspections | | |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 6 | | Acknowledgment" forms. c) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms that were completed by third party contractors. completed in 2022. CalAdvocates-Liberty-2023WMP-05_Liberty CalAdvocates-Liberty-2023WMP-05_Liberty Aaron Louie 2/24/2023 3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com) | | Grid Design, operations, and maintenance (8.1) 8.1.6 |
| | | | | | | |

| | | | Please augment Table 13 of the non-spatial data tables in your WMP Quarterly Data Report Q4 of 2022, which reports asset-related corrective notifications on electric circuits that were open at the end of the quarter. Add the following information in separate columns: a) Nar the associated circuit b) ID number of the associated circuit | | | | | | 1 | | |
|----------------|---|-------------|--|--|--|-----------------|---|---|---|---|--|
| | | | c) Geographic latitude in decimal degrees, truncated to seven decimal places d) Geographic longitude in decimal degrees, truncated to seven decimal places | | | | | CalAdvocates-Liberty-2023WMP-05 Liberty_ | | | Grid Design, operations, and |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 7 CalAdv-0 | | | Aaron Louie | 2/24/2023 | 3/30/202 | 4/10/2023 Response 04102023.pdf (libertyutilities.com) | | 8 | maintenance (8.1) 8.1.6 |
| | | | that differs from the priority levels specified in General Order 95, Rule 18? b) If the answer to part (a) is yes, please explain your internal priority system. c) Do you ever re-inspect corrective notifications before they are resolved? | assess the prioritization of corrective actions and replacements.c) Yes.d) Liberty has conducted re-inspections through its detailed asset inspection program of | | | | | | | |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 8 CalAdv-0 | d) If the answer to the part (b) is yes, under what circumstances do you conduct re-inspect | ons? assets that were inspected as part of its full system survey conducted in 2020. Additionally, the Job Facilitator's role may include verification of issues identified during an inspection. | Aaron Louie | 2/24/2023 | 3/30/2023 | CalAdvocates-Liberty-2023WMP-05 Liberty 4/10/2023 Response 04102023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance (8.1) 8.1.6 |
| | | | Please provide a list of any incidents in 2022 where the actions of a VM contractor posed a safety risk to workers and/or the public. "Safety risk" here is defined as any occurrence on worksite where the contractor's behavior created a safety hazard for either workers or the | posed a safety risk to workers or the public. | | -,-, | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | | | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 1 CalAdv-0 | general public. For each instance, please provide: a) The date you were informed of the saissue | | Aaron Louie | 2/24/2023 | 4/19/2023 | CalAdvocates-Liberty-2023WMP-06 Liberty 4/26/2023 Response 04262023.pdf (libertyutilities.com) | | 8 | Vegetation Management and Inspections (8.2) 8.2.7 |
| Calmuvocates | o Caravocates Liberty 2023WWI -00 | 1 CalAdv 0 | b) The date that the original work that created the safety issue was performed Provide your workplan that describes where and when you will perform system hardening distribution circuits in 2023. For projects that you expect to partially complete in 2023 (i.e. projects that started before 2023 and are expected to continue in 2023, or projects that ar expected to be completed after 2023), please include the project and report the work wha | Response Questions 2 and 3." | Aaron Louic | 2/24/2023 | 4/ 13/ 202 | | 1 | | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 2 CalAdv-0 | Provide your workplan that describes where and when you will perform system hardening | on Refer to tab "2024" in supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty | Aaron Louie | 2/24/2023 | 4/19/2023 | CalAdvocates-Liberty-2023WMP-06_Liberty 4/26/2023 Response 04262023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance (8.1) 8.1.2 |
| | | | distribution circuits in 2024. For projects that you expect to partially complete in 2024 (i.e. projects that are expected to start before 2024 and are expected to continue in 2024, or partial that are expected to be completed after 2024), please include the project and report the ways. | ojects | | | | | 1 | | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 3 CalAdv-0 | For each of your 2023-2025 WMP system hardening initiatives, please provide disaggregate | | Aaron Louie | 2/24/2023 | 4/19/2023 | CalAdvocates-Liberty-2023WMP-06 Liberty Response 04262023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance (8.1) 8.1.2 |
| | | | information related to expenditures and circuit miles treated in the attached table, Cal Advocates-Liberty-2023WMP-06_Attachment Tab 1. Add extra columns as needed. Note: for purposes of this question, "line removal" refers to conductors that are permanently removal." | ed | | | | | 1 | | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 4 CalAdv-0 | Regarding your PSPS circuit modeling capabilities: a) Please describe your present circuit | a) Liberty's 2023 WMP section 6.2 includes the baseline PSPS risk analyses and assessment | Aaron Louie | 2/24/2023 | 4/19/2023 | CalAdvocates-Liberty-2023WMP-06_Liberty 4/26/2023 Response 04262023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance (8.1) 8.1.2 |
| | | | modeling capabilities with regard to PSPS decision-making ("PSPS circuit modeling capabilit including with what level of granularity they are able to determine how circuit hardening efforts or other changes to a line segment wil | framework has not been developed and the model inputs currently do not incorporate grid hardening efforts and is a static study. The decision-making framework would have to | | | | | | | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 5 CalAdv-0 | affect PSPS thresholds. 6-6.5 b) Please describe any improvements to the present PSPS circuit modeling capabilities that Identify any ignitions in 2022 associated with assets where you had an existing corrective | consider current PSPS thresholds affecting each circuit and any current PSPS mitigation controls in place would also need to be factored in and calculated separately to support Liberty did not have any ignitions in 2022 associated with assets where it had an existing | Aaron Louie | 2/24/2023 | 4/19/2023 | CalAdvocates-Liberty-2023WMP-06 Liberty 4/26/2023 Response 04262023.pdf (libertyutilities.com) | | 6 | Risk Analysis Framework (6.2) N/A |
| | | | notification at the time of the ignition. Please provide a spreadsheet listing each such ignit (as rows) with the following information in separate columns: a) Unique ignition ID b) Date of ignition | on corrective notification at the time of the ignition | | | | | | | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 6 CalAdv-0 | UT TYPE OF ASSOCIATED WITH THE PENTION | g the a) In its 2023 WMP, Liberty provides a map in Figure 5-11 showing its service territory | Aaron Louie | 2/24/2023 | 4/19/2023 | CalAdvocates-Liberty-2023WMP-06_Liberty 4/26/2023 Response 04262023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance (8.1) 8.1.2 |
| | | | 85th percentile consequence calculation." a) Why hasn't Liberty conducted a wildfire risk assessment using the 85th percentile consequence calculation? b) What other wildfire risk assessments has Liberty conducted instead? | overlaid with the Social Vulnerability Index (SVI) and its current Reax wildfire risk polygons. Liberty provides an additional map in Appendix C of its 2023 WMP showing the SVI distribution, Liberty's updated utility risk analysis in its 2023 WMP, and major roads. | | | | | | | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 1 CalAdv-0 | | Due to increased risk modeling requirements in the Office of Energy Infrastructure Safety | Talal Harahsheh | 5/18/2023 | 5/23/202 | CalAdvocates-Liberty-2023WMP-07 Liberty S/23/2023 Response 05232023.pdf (libertyutilities.com) | | 5 | Community Values at Risk (5.4) 5.4.3.2 |
| | | | Survey reports produced by CAL FIRE identified 10 sub-divisions in South Lake Tahoe with secondary egress, and one with limited egress. These sub-divisions consist mostly of single | | | | | | 1 | | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 2 CalAdv-0 | FIRE identified 21 subdivisions with no secondary egress, and three with limited egress. Th | | Talal Harahsheh | 5/18/2023 | 5/23/202 | CalAdvocates-Liberty-2023WMP-07_Liberty 5/23/2023 Response 05232023.pdf (libertyutilities.com) | | 5 | Community Values at Risk (5.4) 5.4.3.3 |
| | | | coordination for O&M activities difficult, sometimes resulting in delayed activities or their cancellation entirely." a) Please describe what methods or strategies Liberty has adopted t ameliorate the problem noted above. | Door hangers | | | | | | | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 3 CalAdv-0 | b) Please describe Liberty's method of maintaining accurate and up-to-date contact inform | Social media posts Email | Talal Harahsheh | 5/18/2023 | 5/23/202 | CalAdvocates-Liberty-2023WMP-07 Liberty 5/23/2023 Response_05232023.pdf (libertyutilities.com) | | 5 | Community Values at Risk (5.4) 5.4.5 |
| | | | Agency] to update an existing memorandum of understanding ("MOU") for O&M activities | | | | | | | | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 4 CalAdv-0 | understanding with Tahoe Regional Planning Agency? b) If the answer the part (a) above i | | Talal Harahsheh | 5/18/2023 | 5/23/202 | CalAdvocates-Liberty-2023WMP-07_Liberty 5/23/2023 Response 05232023.pdf (libertyutilities.com) | | 5 | Community Values at Risk (5.4) 5.4.5 |
| | | | Although the current approach provides significant advancements over earlier efforts, it w neither reasonable nor feasible to conduct all the calculations and analyses provided in the | 2023 WMP submission. Refer to the OEIS 2023-2025 Wildfire Mitigation Plan Technical Guidelines for the calculations and analysis provided in the guidelines. | | | | | | | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 5 CalAdv-0 | 2023-2025 Wildfire Mitigation Plan Technical Guidelines ("Technical Guidelines") prior to Liberty's 2023 WMP submission. Liberty, however, is committed to continuing to evolve an improve its risk modeling practices and intends to conduct the analyses and calculations | risk analytics utilizing its Wildfire Risk Reduction Model ("WRRM"). Liberty received its | Talal Harahsheh | 5/18/2023 | 5/23/202 | CalAdvocates-Liberty-2023WMP-07_Liberty 5/23/2023 Response 05232023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6 |
| CalAdvocates | / CalAdvocates-Liberty-2025WWII-07 | S CalAdv-0 | Page 70 of Liberty's WMP states that social vulnerability, physical vulnerability, and coping capabilities are not factors currently included in the wildfire risk analysis though Liberty in | a) Liberty has not determined all attributes/characteristics it will utilize to define physical vulnerability. Liberty considers Medical Baseline (MBL) and some Access and Functional | | 3/13/2023 | 3/23/202 | S S/25/2025 Response 05252025.pdf (libertydtilities.com) | | | Nisk Wethodology and Assessment |
| | | | to incorporate these factors in its future risk modeling process. a) When Liberty eventually incorporates the factor "physical vulnerability" within future wildfire risk analyses, what attributes/characteristics would Liberty utilize to define "physical vulnerability"? | assign weights to different customer categories (i.e., AFN/MBL, Commercial, Residential, Critical Facilities) based on physical vulnerability. b) Liberty maintains a list of MBL | | F (4.0 (2022) | 5 /22 /202 | CalAdvocates-Liberty-2023WMP-07 Liberty | | | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 6 CalAdv-0 | Please provide an Excel sheet listing of each sustained outage that was caused by equipme failure for the period from 2020 to 2022 in any HFTD area. A sustained outage is an outage | | Talal Harahsheh | 5/18/2023 | 5/23/202 | Response_05232023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.2 |
| Col Advantage | 0 Calladira anton Librario 2022/A/AD 00 | 1 Callada O | lasts for five or more minutes. The Excel sheet should list each outage as a row, with the following information in columns: a) ID number of the circuit affected. b) Name of the circuit affected. | | Talal Hasababab | F /40 /2022 | 5 /22 /202 | CalAdvocates-Liberty-2023WMP-08_Liberty | 1 | | Grid Design, operations, and |
| CalAdvocates | 8 CalAdvocates-Liberty-2023WMP-08 | 1 CalAdv-0 | Page 70 of Liberty's WMP states that social vulnerability is not a factor currently included i | leling to submission of the 2023 WMP, Liberty was not able to incorporate social vulnerability | Talal Harahsheh | 5/18/2023 | 5/23/202 | Response 05252023.pdf (libertyutilities.com) | | 8 | maintenance (8.1) |
| | | | a) Please identify the constraint(s) that hindered the incorporation of social vulnerability p to Liberty's 2023 WMP submission. | this enhancement in its future WMP filings. | | | | | | | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 1 CalAdv-0 | b) State when Liberty anticipates being able to include social vulnerability as part of Libert risk modeling process.c) In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? | | Talal Harahsheh | 5/26/2023 | 6/1/202 | CalAdvocates-Liberty-2023WMP-09_Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.2 |
| | | | Page 70 of Liberty's WMP states that physical vulnerability is not a factor currently include Liberty's wildfire risk analysis, though Liberty intends to incorporate it in its future risk mo process. a) Please identify the constraint(s) that hindered the incorporation of physical | a) Liberty's current fire science consultant, Dr. Chris Lautenberger, has advised Liberty that there is currently no validated generalized methodology that relates physical characteristics of structures to their survivability in wildland fires. Put differently, it is | t | | | | | | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 2 CalAdv-0 | vulnerability prior to Liberty's 2023 WMP submission. b) State when Liberty anticipates being able to include physical vulnerability as part of Liberty. | Liberty's understanding that fragility curves to quantify a structure's probability of being | Talal Harahsheh | 5/26/2023 | 6/1/202 | CalAdvocates-Liberty-2023WMP-09 Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.2 |
| | | | Page 70 of Liberty's WMP states that coping capability is not a factor currently included in Liberty's wildfire risk analysis, though Liberty intends to incorporate it in its future risk mo process. | a) With the WMP technical guidelines issued approximately 3 months prior to submission | | | | | | | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 3 CalAdv-0 | a) Please identify the constraint(s) that hindered the incorporation of coping capability pri Liberty's 2023 WMP submission. 9-9.3 b) State when Liberty anticipates being able to include coping capability as part of Liberty's | b) Liberty plans to incorporate coping capacity in 2024 and report on this enhancement in its future WMP filings. | Talal Harahsheh | 5/26/2023 | 6/1/202 | CalAdvocates-Liberty-2023WMP-09_Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.2 |
| | | | Page 70 of Liberty's WMP states the following factors are included as part of Liberty's wildfrisk analysis: Equipment/assets, Topography, Weather, Vegetation, Climate change, Assets risk, and Fire ignition and spread. | re a) Equipment/assets: GIS data are used to construct an ignition buffer surrounding | | | | | | | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 4 CalAdv-0 | Please explain how each of these factors impacts Liberty's quantification of risk at the circulevel: | | Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-09 Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.2 |
| | | | Page 70 of Liberty's WMP states the following factors are included as part of Liberty's wildfrisk analysis: • Equipment/assets, | | | 3,23,202 | 2, 2, 222 | | | | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 5 CalAdv-0 | Topography,Weather, | Topography, weather, vegetation, climate change, assets at risk: Liberty is an end user – not a developer – of these datasets that serve as inputs to its fire spread modeling. In all | Talal Harahsheh | 5/26/2023 | 6/1/202 | CalAdvocates-Liberty-2023WMP-09_Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.2 |
| | | | Page 71 of Liberty's WMP states that "Finally, Liberty also does not consider burn probabil from fires caused by sources other than utilities as in the Technical Guidelines." Please explain why Liberty does not consider the burn probability from fires caused by sou | Liberty's fire risk modeling currently addresses only fires caused by its infrastructure. Impacts from other fires to Liberty's system is a grid resiliency issue that Liberty may | | 2, 2, 2 | -, , | | | | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 6 CalAdv-0 | other than utilities. | address in the ratare after its atimty caused inc risk modeling has matured | Talal Harahsheh | 5/26/2023 | 6/1/202 | CalAdvocates-Liberty-2023WMP-09 Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.2 |
| | 232344411 03 | - Cainav-0 | Page 81 of Liberty's WMP, states "Overall utility risk is calculated by circuit from wildfire risk PSPS risk, with an 80% weight to wildfire risk and 20% to PSPS risk." | The sentence "Overall utility risk is calculated by circuit from wildfire risk and PSPS risk, with an 80% weight to wildfire risk and 20% to PSPS risk" contains a typographical error. It isk should read "Overall utility risk is calculated by summing wildfire risk and PSPS risk by | | -, ->, LVLV | J, <u>2</u> , 202. | | | | G, 1313555 |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 7 CalAdv-0 | and PSPS risk. b) Has Liberty consulted with any agencies, universities, research groups, or other entities | circuit." The statement about 80/20 weighting was inadvertently left in Liberty's 2023 on the WMP from a previous draft. | Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-09_Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.2 |
| | | Culnuv-0 | Page 96 of Liberty's WMP presents Table 6-7: Liberty Top-Risk Circuits, which provides risk for Liberty's top 20 risk-contributing circuits. With this context: a) Does Liberty sequence its top risk circuit projects one by one according to the risk ranking circuits. | cores a) Liberty works on multiple circuits simultaneously. b) Liberty plans to conduct grid design and system hardening work on 16 of the top 20 risk | | 2, 23, 2525 | -, -, -, | | | | 5, 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 8 CalAdv-0 | does Liberty work on multiple top risk circuit projects simultaneously? b) On how many of the top 20 risk-contributing circuits will Liberty complete grid design ar | c) No. d) As stated in Section 7.2.2.3 of its 2023 WMP, Liberty does not yet have sufficient | Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-09 Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | | 6 | Risk Methodology and Assessment 6.4 |
| 53.7.417541165 | ZOZOWINI OJ | _ CalAuv-0 | Page 96 of Liberty's WMP presents Table 6-7: Liberty Top-Risk Circuits, which provides risk for Liberty's top 20 risk-contributing circuits. Please provide an Excel table that augments Table 6-7 with information about planned wil | cores Refer to file: CalAdvocates-Liberty-2023WMP-09_Liberty Response Question 9 | and the second s | 3, 20, 2023 | J, <u>1</u> , 202. | , , | | | 0.4 |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 9 CalAdv-0 | mitigation measures on each circuit during the 2023-2025 WMP cycle. Specifically, the table should add these new columns to Table 6-7: | | Talal Harahsheh | 5/26/2023 | 6/1/2022 | CalAdvocates-Liberty-2023WMP-09 Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | 1 | c | Risk Methodology and Assessment 6.4 |
| CaiAuvocates | J Cainavocates-Liberty-2025WWP-09 | S CalAdv-0 | Pages 104-105 of Liberty's WMP states: In late January 2023, Liberty signed a formal agreement with Direxyon to pilot its asset risk | a) Refer to file: CalAdvocates-Liberty-2023WMP-09_Liberty Response Question 10a for the scope of work of the pilot project with Direxyon. Liberty provided data to Direxyon that | | 3/ 20/ 2023 | 0/ 1/ 202 | o, 1, 2023 <u>response_00012025.pai (iibertyutiiities.com)</u> | | 6 | 6.4 |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 10 CalAdv-0 | decision-making solution to be incorporated, in part, in this WMP. If the pilot is successful the pole asset type and produces effective decision-making tools Liberty will continue but out the risk-informed decision-making tools for multiple assets to better plan future | Iding in service risk for pole assets. The information included, but was not limited to, pole age, pole type, date of last inspection, GO 165 condition findings, vegetation LiDAR clearance | Talal Harababab | 5/26/2023 | 6/4/200 | CalAdvocates-Liberty-2023WMP-09 Liberty 6/1/2023 Response 06012023.pdf (libertyutilities.com) | 1 | | Risk Methodology and Assessment 6.7 |
| CalAuvocates | 5 Can avocates-Liberty-2025WIVIP-09 | CaiAdv-U | Page 107 of Liberty's WMP states "Liberty's strategy development for this WMP did not uti wildfire risk scores developed by Reax." | b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. | | JI 201 2023 | o/ 1/ 2UZ: | , ., ., ., ., ., ., ., ., ., ., ., | | | b./ |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 11 CalAdv-0 | a) Does Liberty plan on utilizing the wildfire risk scores developed by Reax to help plan fut decisions regarding wildfire mitigation? b) If the answer to part (a) above is yes, when does Liberty plan on utilizing the wildfire ris | portfolio plan approach in its next WMP that incorporates data analytics and risk- | n Talal Harahsheh | 5/26/2023 | 6/4/202 | CalAdvocates-Liberty-2023WMP-09 Liberty 6/1/2023 Response 06012023 pdf (libertyutilities com) | | | Wildfire Mitigation Strategy |
| CalAuvocates | 5 CarAuvocates-Liberty-2023WMP-09 | LI CalAdv-0 | On page 173 of its WMP, Liberty states that its 2022 target for Patrol Inspections of Distribution of Liberty to Electric Lines and Equipment was erroneously established at 706.3 miles, causing Liberty to | miss territory. Liberty does not perform patrol inspections in areas where detailed inspections | | 5/20/2023 | o/ 1/ 2023 | Response_06012023.pdf (libertyutilities.com) | | | Development |
| Colladore | 10 CalAdvocatos Liberty 2022 (17.42 | 1 | its 2022 inspection target by 203 miles. Please respond to the following: a) Explain how Liberty mistakenly set a target of 706.3 miles. b) State the basis for why Liberty believes the target should have been closer to 503 miles (the amount Liberty was able to | b) Liberty's 2022 target of 503 miles for Patrol Inspections of Distribution Electric Lines | Talal Hareket | E /3.C /3.2.2.2 | C 4 10 = = | CalAdvocates-Liberty-2023WMP-10 Liberty 6/2/2023 Response 06022023 pdf (liberty-utilities com) | | | Grid Design, operations, and |
| CalAdvocates | 10 CalAdvocates-Liberty-2023WMP-10 | ı CalAdv-1 | 0-10.1 complete in 2022). | and Equipment is a function of total overhead miles (706.3 miles) minus detailed | ji aiai ⊓aransheh | 5/26/2023 | b/1/2023 | 8 6/2/2023 Response 06022023.pdf (libertyutilities.com) | | 8 | maintenance (8.1) 8.1.3 |

| | | | | On page 174 of its WMP, Liberty states that it completed Quality Assurance and Quality Control | a) 24 | | | | | | |
|---------------|---|---|-----------------|--|--|----------------------|-------------|-------------|---|-----|--|
| | | | | (QA/QC) on 0.0044% of its detailed asset inspections in 2022, while Liberty's target was to QA/QC 0.0050% of the detailed asset inspections in 2022. Please respond to the following: | b) Yes. c) N/A | | | | | 1 | |
| CalAdvocates | 10 CalAdvocates-Liberty-2023WMP-10 | 2 | CalAdv-10-10.2 | a) How many individual asset inspections did Liberty conduct QA/QC on in 2022? b) Are both transmission and distribution detailed inspections included in the 0.0044% figure? c) If the answer is to part (b) above is "no." please answer which type of detailed inspections is | d) 15 transmission (60 kV) and 9 distribution. e) Refer to file: CalAdvocates-Liberty-2023WMP-10_Liberty Response Question 2. f) Liberty targeted 0.5% of detailed inspections as its OA/OC target as a starting point for | Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-10 Liberty 6/2/2023 Response_06022023.pdf (libertyutilities.com) | 8 | Grid Design, operations, and maintenance (8.1) 8.1.3 |
| | | - | | On page 182 of its WMP, Liberty states that it implemented its asset inspection QA/QC in 2022 with a 0.5% sample of detailed inspections that were re-inspected by third-party inspectors. | a) The discrepancy is a typo. Liberty's QA/QC target for detailed asset inspections is 0.5%. b) N/A | | 3,=3,=1=1 | -, -, | | | |
| | | | | Minimal differences were noted by the third-party inspectors, who found only very minor infractions during the re-inspections if differences were noted at all. a) Please explain the apparent discrepancy between the targets stated on pages 174 and 182 for | | | | | CalAdvocates-Liberty-2023WMP-10 Liberty | | Grid Design, operations, and |
| CalAdvocates | 10 CalAdvocates-Liberty-2023WMP-10 | 3 | CalAdv-10-10.3 | OA/OC of detailed asset inspections (0.005% on page 174 and 0.5% on page 182). On page 182 of its WMP, Liberty states that it implemented its asset inspection QA/QC in 2022 | a) 24 | Talal Harahsheh | 5/26/2023 | 6/1/2023 | | 8 | maintenance (8.1) 8.1.6 |
| | | | | with a 0.5% sample of detailed inspections that were re-inspected by third-party inspectors. Minimal differences were noted by the third-party inspectors, who found only very minor infractions during the re-inspections if differences were noted at all. | b) Six re-inspections noted minor differences. c) Examples include noting Level 3 differences such as foreign sign, loose secondary down guy, and auto splice 1" away from insulator. | | | | | | |
| CalAdvocates | 10 CalAdvocates-Liberty-2023WMP-10 | 4 | CalAdv-10-10.4 | Please respond to the following: a) How many third-party OA/OC checks were completed on detailed asset inspections in 2022? | | Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-10 Liberty 6/2/2023 Response_06022023.pdf (libertyutilities.com) | 8 | Grid Design, operations, and maintenance (8.1) 8.1.6 |
| | | | | On page 183 of its WMP, Liberty states: As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and internal crews are working to expedite the process. | a) Liberty halted its detailed inspections on January 1st, 2023, with the exception of detailed underground inspections due in 2023. b) 40.3 circuit miles. | | | | | | |
| | | | | Liberty also states that it "will halt its detailed inspections in order to catch up with its open maintenance work orders and resume detailed inspections in 2024." | c) Liberty has not completed detailed inspections yet in 2023. d) Liberty is currently planning to resume its detailed inspections on January 1st, 2024. | | | | CalAdvocates-Liberty-2023WMP-10 Liberty | | Grid Design, operations, and |
| CalAdvocates | 10 CalAdvocates-Liberty-2023WMP-10 | 5 | | Please respond to the following: On page 183 of its WMP, Liberty states: As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and | e) Liberty will remain in compliance with GO95 and 165. a) Liberty is halting its detailed overhead inspections in 2023 in order to avoid further overlap of infractions found in its 2020 full system survey and prioritize repairs to | Talal Harahsheh | 5/26/2023 | 6/1/2023 | Response 06022023.pdf (libertyutilities.com) | 8 | maintenance (8.1) 8.1.7 |
| | | | | internal crews are working to expedite the process. Please respond to the following: | infractions found during the system survey b) Liberty's full system survey completed in 2020 included all overhead lines that normally | y | | | | | |
| CalAdvocates | 10 CalAdvocates-Liberty-2023WMP-10 | 6 | CalAdv-10-10.6 | a) Explain Liberty's rationale for halting detailed inspections in 2023 to reduce the number of open work orders on Liberty's system. as referenced in the quote above. a) Describe Liberty's current staffing resources allocated to each of the following items under | are inspected over a five-year period. Liberty will remain compliant during 2023 without completing any overhead detailed inspections. a) Liberty's current staffing resources include: | Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-10 Liberty Response_06022023.pdf (libertyutilities.com) | 8 | Grid Design, operations, and maintenance (8.1) 8.1.7 |
| | | | | asset management, including but not limited to: a. Inspections | a. Inspections: Five internal inspectors and one contract inspector b. Maintenance: Four internal crews and three contract crews available | | | | | | |
| CalAdvocates | 10 CalAdvocates-Liberty-2023WMP-10 | 7 | CalAdv-10-10.7 | b. Maintenance c. Resolution of open work orders and any other items not listed above. b) Please explain how Liberty's current staffing is sufficient or not sufficient to comply with | c. Open work orders and other: Same as above plus five internal troublemenb) Liberty's current staffing has been sufficient to comply with regulatory requirements for asset management and inspection. | r Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-10_Liberty 6/2/2023 Response 06022023.pdf (libertyutilities.com) | | |
| 54.74.75.44.5 | 20 00.110.100.100.100.100.100.100.100.100 | · | 00.7.07 20 20.7 | Page 109 of Liberty's WMP states that "Liberty sought to separately strategize future risk model refinements and approaches by onboarding new vendors to help develop a formal risk model | a) Yes. | | 3, 23, 2323 | 0, 1, 1010 | (, a, | | |
| | | | | decision framework for Liberty." a) Are the "new vendors" that Liberty refers to above IBM and Direxyon? b) If the answer to part (a), above is no, please provide the name of the vendors and a | | | | | Liberty Response to DR CalAdvocates-Liberty- | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | 1 | CalAdv-11-11.1 | description of how Liberty is utilizing each vendor to develop its formal risk model decision Pages 109-110 discuss Liberty's risk evaluation process and how Liberty utilizes Figure 7-1: Risk | , , | Talal Harahsheh | 6/1/2023 | 6/6/2023 | | 7 | Risk Evaluation (7.1) 7.1.1 |
| | | | | Identification and Analysis for WMP. With this context: a) What is the total number of "discussion points" that Liberty will plot on Figure 7-1 while conducting its risk evaluation process? | risk evaluation process as Liberty advances its risk model decision framework. b) Examples of discussion points included in the risk evaluation process are: • identification of all risk events; | | | | | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | 2 | CalAdv-11-11.2 | b) Please list all of the "discussion points" that Liberty will plot on Figure 7-1 as part of the risk identification and analysis. | likelihood of wildfire risk drivers; impacts of significant weather (snow and wind) on asset degradation and health: | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 2023WMP-11.pdf (libertyutilities.com) | 7 | Risk Evaluation (7.1) 7.1.1 |
| | | | | Pages 116-117 of Liberty's WMP identify the Topaz circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context: | a) Yes. b) Liberty is completing traditional overhead hardening on three projects in 2023. Those projects are Cunningham Lane, Eastside Lane, Larsen Lane. Liberty is also replacing or | | | | | | |
| | | | | a) Does Liberty have any system hardening mitigation work planned in 2023 for the Topaz circuitisted above? b) If the answer to part (a) above is yes, please identify the mitigation work | repairing various poles on this circuit to address needs found during system surveys. c) N/A | | | | Liberty Response to DR CalAdvocates-Liberty- | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | 3 | CalAdv-11-11.3 | selected for the circuit. Pages 116-117 of Liberty's WMP identify the Muller circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score | d) Yes. a) Yes. b) Liberty is replacing or repairing various poles on this circuit to address needs found | Talal Harahsheh | 6/1/2023 | 6/6/2023 | 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | 7 | Risk Evaluation (7.1) 7.1.3 |
| | | | | wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context: a) Does Liberty have any system hardening mitigation work planned in 2023 for the Muller | b) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys. c) N/A d) Yes. | | | | | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | 4 | CalAdv-11-11.4 | circuit listed above? b) If the answer to part (a) above is ves. please identify the mitigation work selected for the Pages 116-117 of Liberty's WMP identify the Meyers circuit as being in an area of elevated | e) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys. Liberty is also planning to do some system hardening on this a) Yes. | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 2023WMP-11.pdf (libertyutilities.com) | 7 | Risk Evaluation (7.1) 7.1.3 |
| | | | | wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context: | | | | | | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | E | CalAdv-11-11.5 | a) Does Liberty have any system hardening mitigation work planned in 2023 for the Meyers circuit listed above? | complete 0.11 miles of undergrounding on the Cascade Project. Liberty is also replacing or repairing various poles on these circuits to address needs found during system surveys. | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | Risk Evaluation (7.1) 7.1.3 |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WWP-11 | 5 | CalAdv-11-11.5 | b) If the answer to part (a) above is ves. please identify the mitigation work selected for the Page 127 of Liberty's WMP states, "Liberty is currently evaluating wildfire risk results in consultation with its analytics team. Liberty has developed an interim mitigation strategy for its | During the 2023-2025 WMP cycle. | Talai Haransilen | 0/1/2023 | 6/6/2023 | 5 6/6/2023 2023WIMP-11.pdf (libertyutilities.com) | | RISK EVALUATION (7.1) |
| | | | | vegetation portfolio and plans to expand this strategy to incorporate assets in the future." When does Liberty anticipate it will have expanded its interim mitigation strategy to incorporate | e | | | | Liberty Response to DR CalAdvocates-Liberty- | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | 6 | CalAdv-11-11.6 | asset management measures, as referenced in the quote? Page 128 of Liberty's WMP states, "Liberty is actively planning and executing wildfire mitigation | a) No. | Talal Harahsheh | 6/1/2023 | 6/6/2023 | · | 7 | Risk Evaluation (7.1) 7.1.4 |
| | | | | initiatives while developing its risk based decision-making process." a) Are any WMP activities or initiatives that Liberty is executing in 2023 based upon the | b) N/A c) The abovementioned risk based decision-making process is not complete. Liberty used | | | | | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | 7 | CalAdv-11-11.7 | abovementioned risk based decision-making process? b) If the answer to part (a) is yes, please explain which activities or initiatives in 2023 flow from the risk based decision-making process. | risk-based principles and tools (i.e., Reax risk map) to inform decision-making. | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | 7 | Risk Evaluation (7.1) 7.1.4 |
| | | | | Page 135 of Liberty's WMP states: In conjunction with this study, Liberty also plans to assess the asset risk reduction and | a) Examples of evaluation criteria Liberty considered are cost, accuracy of risk identification and model outputs, system compatibility, the feasibility of scenarios and | | | | | | |
| | | | | vegetation risk reduction at an operational performance level utilizing IBM's work management platform. IBM's Maximo asset health and predict solution that was customized for Liberty will integrate asset risk and detailed vegetation risk scores to help asset and vegetation managers | the ability to operationalize model outputs given available resources. b) Liberty has decided to not move forward with IBM's proposed solution at this time. c) Liberty has decided to not move forward with IBM's proposed solution at this time. | | | | Liberty Response to DR CalAdvocates-Liberty- | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | 8 | CalAdv-11-11.8 | better assess operational risk to plan and adjust work activities for significant weather event Page 138 of Liberty's WMP states: | a) Liberty plans to have an initial risk-informed decision-making framework for overhead | Talal Harahsheh | 6/1/2023 | 6/6/2023 | 3 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | 7 | Risk Evaluation (7.1) 7.2.2 |
| | | | | Liberty's risk-informed decision-making framework is under development. Liberty's engineering, planning, and regulatory staff will need three to six months post-product/service delivery of all risk studies to fully engage with internal subject matter experts to evaluate the results of the | | | | | | | |
| CalAdvocates | 11 CalAdvocates-Liberty-2023WMP-11 | 9 | CalAdv-11-11.9 | risk analyses. a) When (i.e., month and year) does Liberty expect the development (referenced in the quote | studies (i.e., Technosylva modeling results, Reax modeling results, Direxyon outputs), OEIS risk modeling guidelines, and collaborative discussions with stakeholders through | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 2023WMP-11.pdf (libertyutilities.com) | 7 | Risk Evaluation (7.1) 7.2.3 |
| | | | | On pp. 29-30 of its WMP, Liberty describes its actual WMP spends for the 2020-2022 cycle. Please provide a breakdown of the actual spends including at least the following categories: • Risk assessment and modeling | on March 8, 2023. (b) See response 1a. | | | | | | |
| CalAdvocates | 12 CalAdvocates-Liberty-2023WMP-12 | 1 | CalAdv-12-12.1 | Grid design and system hardening Asset management and inspections | c) See response 1b. | Talal Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-12_Liberty 6/9/2023 Response 06092023.pdf (libertyutilities.com) | | Proposed Expenditures (4.3) |
| CalAdvocates | 12 Caladvocates-Liberty-2025WWII-12 | | CaiAuv-12-12.1 | Vegetation management and inspections On p. 30 of its WMP, Liberty describes its planned spends for the 2023-2025 WMP cycle. Please provide a breakdown of the described proposed expenditures including at least the following | a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS on March 8, 2023. | | 0/0/2023 | 0/3/2023 | of 3/2023 <u>Response_00032023.pdr (insertydtintres.com)</u> | | Troposed Experialitures (4.5) |
| | | | | categories: Risk assessment and modeling | b) See response 2a. c) See response 2b. | | | | CalAdvocates-Liberty-2023WMP-12 Liberty | | |
| CalAdvocates | 12 CalAdvocates-Liberty-2023WMP-12 | 2 | | Grid design and system hardening Asset management and inspections On pp. 201-202 of its WMP, Liberty provides Table 8-18: "Liberty Vegetation Inspections Targets | | Talal Harahsheh | 6/6/2023 | 6/9/2023 | | 4 | Proposed Expenditures (4.3) |
| | | | | by Year." Please explain why the row describing Liberty's Vegetation Targets by Year for the Initiative Activity "Program – LiDAR" is blank. | to page 202. There should only be one row for "Vegetation Management Inspection Program – LiDAR" and the initiative activity row was inadvertently split up due to the page break. | | | | | | |
| CalAdvocates | 12 CalAdvocates-Liberty-2023WMP-12 | 3 | CalAdv-12-12.3 | | | Talal Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-12_Liberty 6/9/2023 Response 06092023.pdf (libertyutilities.com) | 8 | Vegetation Management and Inspections (8.2) 8.2.1.2 |
| | | | | On p. 209 of its WMP, Liberty provides Figure 8-4: "Liberty VM Inspection Overview." a) Please describe what steps Liberty takes if a customer refuses access to his or her property for either a vegetation inspection or a vegetation maintenance activity. | a) If Liberty VM field personnel are unable to perform their job function due to a customer refusing access, the refusal shall be documented in the VM system and on the Refusal Form document. If possible, the vegetation condition and vicinity to facilities | | | | | | |
| | | | | b) Please provide any internal protocols, handbooks, or other documents that describe the actions Liberty takes if a customer refuses access to his or her property for either a vegetation | should be photographed for reference and record keeping. Liberty VM field personnel (VM inspectors, VM workers) communicate the refusal as soon | | s /s /s s | s to to one | CalAdvocates-Liberty-2023WMP-12 Liberty | | Vegetation Management and |
| CalAdvocates | 12 CalAdvocates-Liberty-2023WMP-12 | 4 | CalAdv-12-12.4 | inspection or a vegetation maintenance activity. On p. 243 of its WMP, Liberty provides Table 8-31: "Past Due Vegetation Management Work Orders Categorized by Age." | as possible to their immediate supervisor for resolution. Every effort should be made bya) Age refers to the date the work order was first created.b) Liberty details how work orders are prioritized based on risk and how mitigation | Talal Harahsheh | 6/6/2023 | 6/9/2023 | Response 06092023.pdf (libertyutilities.com) | 8 | Inspections (8.2) 8.2.2 |
| | | | | a) In this table, does "age" refer to days since the work order was first created or days since the work order's due date? | timeframes are identified based on observed field conditions in Section 8.2.6 of the 2023 WMP (page $240 - 241$) and per its VM-05, Vegetation Threat Procedure. Liberty intends to | | | | | | |
| CalAdvocates | 12 CalAdvocates-Liberty-2023WMP-12 | 5 | CalAdv-12-12.5 | b) Please explain why there are 2,588 past due work orders in HFTD Tier 2 Areas with ages of 181+ days. Please provide copies of the following documents: | complete work orders and mitigate identified tree conditions within the timelines specified in its VM-05 based on the priority level of assigned to the vegetation work order a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) | Talal Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-12_Liberty Response 06092023.pdf (libertyutilities.com) | 8 | Vegetation Management and Inspections (8.2) 8.2.6 |
| | | | | a) Corporate Emergency Management Plan (CEMP), dated April 27, 2022, referenced on p. 284 or your WMP | | | | | | 2 | |
| CalAdvocates | 13 CalAdvocates-Liberty-2023WMP-13 | 1 | CalAdv-13-13.1 | b) Liberty Utilities Public Safety Power Shutoff Playbook, dated June 13, 2022, referenced on p. 284 of your WMP | | Talal Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-13 Liberty 6/9/2023 Response 06092023.pdf (libertyutilities.com) | R S | Emergency Preparedness (8.4) 8.4.2 |
| | | | | On p. 311 of its WMP, Liberty states "NV Energy is the [Transmission Owner] for Liberty A specific plan for communicating with NV Energy including the information to be provided is | a) Yes. b) N/A | | | , ,, 2020 | ,,,,,,,, . | | |
| | | | | included in the Liberty CEMP" a) Is NV Energy the sole provider of electricity to Liberty's circuits? b) If the answer to part (a) is no, please list the circuits that NV Energy provides electricity to. | c) To the extent possible, Liberty will follow PSPS protocols regarding communications if an NV Energy PSOM event impacts Liberty's power lines and customers. d) Liberty objects to this request as vague and ambiguous with regard to the term "de- | | | | CalAdvocates-Liberty-2023WMP-13 Liberty | 1 | |
| CalAdvocates | 13 CalAdvocates-Liberty-2023WMP-13 | 2 | CalAdv-13-13.2 | c) Please describe Liberty's plan in the event of de-energization of its circuits by NV Energy. On p. 162 of its WMP, Liberty states "[T]hese programs, in particular Liberty's SRP program, may | energizations." overbroad, unduly burdensome, and not reasonably calculated to lead to a) Liberty's SRP program is not currently impacting Liberty's PSPS protocols. In 2023, | Talal Harahsheh | 6/6/2023 | 6/9/2023 | | 8 | Emergency Preparedness (8.4) 8.4.3.2 |
| | | | | reduce the need for PSPS in certain areas." a) Please explain how Liberty's SRP program may reduce the need for PSPS in certain areas. b) Please describe the decision-making process for a situation in which Liberty anticipates PSPS | Liberty is working with University of Nevada, Reno (UNR) to develop the SRP settings and discuss how this could impact PSPS protocols. If SRP settings are set sensitive enough, then the ignition risk from a line could be low enough to act in place of a PSPS. The | | | | | | |
| CalAdvocates | 13 CalAdvocates-Liberty-2023WMP-13 | 3 | CalAdv-13-13.3 | conditions but decides to use its SRP program instead c) Please list all dates in 2022 when Liberty anticipated PSPS conditions but use its SRP program. | settings that Liberty is currently planning to use for the SRP system are not currently proven to be low enough to make this call. Liberty will be evaluating this topic with UNR | Talal Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-13 Liberty Response 06092023.pdf (libertyutilities.com) | 8 | Grid Design, operations, and maintenance (8.1) 8.1.2.6 |
| | | | | Please provide a description of the weather conditions in which Liberty enables its SRP program b) Please identify the months or seasons in which Liberty enables its SRP program. c) Please provide relevant work documents or procedures that Liberty uses related to enabling | a) Various weather conditions influence the SRP decision process, including wind conditions, temperature conditions, and moisture content.b) The area of Liberty service territory and weather conditions in any given year or month | | | | | | |
| Colodina | 12 CalAdvacates Liberty 202214445 42 | А | | its SRP program. | affect whether SRP will be enabled. Based on historical conditions, SRP settings would be enabled in the summer and early fall when the moisture content is low and temperatures | 5 | 61612022 | 6/0/005 | CalAdvocates-Liberty-2023WMP-13 Liberty 6/9/2023 Response 06092023 pdf (liberty-utilities com) | | Grid Design, operations, and |
| CalAdvocates | 13 CalAdvocates-Liberty-2023WMP-13 | 4 | CalAdv-13-13.4 | On p. 162 of its WMP, Liberty states "Liberty will be expanding the 2022 Fast Trip, or SRP, pilot project because of its effectiveness" | and wind conditions can be high. a) Liberty utilized a different program in 2021. Prior to the SRP program pilot in 2022, Liberty utilized "wildfire mode" settings which removes reclosing. The SRP program takes | Talal Harahsheh | 6/6/2023 | 6/9/2023 | Response_06092023.pdf (libertyutilities.com) | 8 | maintenance (8.1) 8.1.2.6 |
| | | | | a) In Liberty's response to CalAdvocates-Liberty-2023WMP-03, Question 1, the excel sheet column Q "q. Total customer-minutes of de-energization on the circuit during fast-trip settings in | this a step further by removing reclosing and lowering the trip settings to a number that impacts relay coordination and reduces incident energy on fault conditions, which in turn | | | | CalAdvocates-Liberty-2023WMP-13 Liberty_ | | Grid Design, operations, and |
| CalAdvocates | 13 CalAdvocates-Liberty-2023WMP-13 | 5 | CalAdv-13-13.5 | 2021" provides a value of 20244.00 for the Circuit Meyers 3300. Please explain if the pilot SRP program began in 2021 or if Liberty used a different program for this de-energization. Liberty's response to question 8 of data request CalAdvocates-Liberty-2023WMP-11 discusses ar | reduces ignition risk. b) In 2022. Liberty utilized a mix of SRP settings and "wildfire mode" settings because the a) In its evaluation of whether to move forward with the proposed solution from IBM, | Talal Harahsheh | 6/6/2023 | 6/9/2023 | | 8 | maintenance (8.1) 8.1.2.6 |
| | | | | "IBM Maximo project" and when the platform would be complete and operational. Liberty's response states, "Liberty has decided to not move forward with IBM's proposed solution at this | Liberty considered factors including: • cost; | | | | | | |
| CalAdvocates | 14 CalAdvocates-Liberty-2023WMP-14 | 1 | CalAdv-14-14.1 | a) Please explain why Liberty has decided not to move forward with the proposed solution from IBM to consolidate its risk data sources. | system compatibility, particularly the risk of moving forward with the solution prior to SAP implementation later this year; and the ability to operationalize model outputs. | Talal Harahsheh | 6/8/2023 | 6/13/2023 | CalAdvocates-Liberty-2023WMP-14_Liberty 6/13/2023 Response_06132023.pdf (libertyutilities.com) | | |
| | | | | Please explain why your QDR for Q1 of 2022 reports the total number of distribution ignitions in 2020 and 2021 as 26, but your QDR for Q2 of 2022 reports the total number of distribution | The number of ignitions reported in Liberty's QDR for Q1 and Q2 of 2022 is incorrect. Liberty's QDR for Q1 of 2023 correctly reports the total number of distribution ignitions in | | | | | | |
| | | | | ignitions in 2020 and 2021 as 4. | 2020 and 2021 as four. | | | | | | |
| CalAdvocates | 15 CalAdvocates-Liberty-2023WMP-15 | 1 | CalAdv-15-15.1 | a) How many reportable distribution ignitions did Liberty experience in 2020? | a) One. | Talal Harahsheh | 6/14/2023 | 6/19/2023 | 3 6/20/2023 | | |
| | | | | b) How many reportable distribution ignitions did Liberty experience in 2021? c) How many reportable distribution ignitions did Liberty experience in 2022? | b) Three. c) One. | | | | | | |
| CalAdvocates | 15 CalAdvocates-Liberty-2023WMP-15 | 2 | CalAdv-15-15.2 | Please provide an Excel cheet licting all ignitions that accounted an excellent in 2000 if | | Talal Harahsheh | 6/14/2023 | 6/19/2023 | 3 6/20/2023 | | |
| | | | | Please provide an Excel sheet listing all ignitions that occurred on your system in 2020 through 2022. Each ignition should be a row. For each ignition, please provide the following columns of data: | | | | | | 1 | |
| CalAdvocates | 15 CalAdvocates-Liberty-2023WMP-15 | 2 | CalAdv-15-15.3 | a) Date b) Circuit ID number c) Line Type (Distribution or Transmission) | | Talal Harahsheh | 6/14/2023 | 6/19/2023 | 3 6/20/2023 | | |
| CalAUVOCALES | 13 Cainavocates-Liberty-2025WIVIP-15 | J | Cui/Cuv-13-13.5 | c) Line Type (Distribution or Transmission) | I | r arar riaransnen | UJ 14J 2U23 | 0/ 13/ 2023 | ر حرا دردی | | |

| | | | | Please provide Liberty's Pre-submission 2023-2025 WMP Base Plan filed on March 6, 2023, with Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP | | | | | | |
|-----------------------|--------------------------|---|------------|--|----------|---|---|------------|----------------|-----|
| | | | | the OEIS per the 2023 WMP Guidelines and Schedule document. Including all attachments and pre-submission. | | | 1 | | | |
| | | | | associated supporting documents required for the Pre-submission 2023-2025 WMP Base Plan | | GPI Liberty 2023WMP 01 Liberty | 1 | WMP Pre- | | |
| Green Power Institute | 1 GPI-Liberty-2023WMP-01 | 1 | GPI-01-1.1 | filing. Gregg Morris | 3/6/2023 | 3/9/2023 3/8/2023 <u>Response_03082023.pdf (libertyutilities.com)</u> | | Submission | Administrative | N/A |