					Liberty 2023 WMP Discovery Log								
Last Updated:6/28/2023CountParty Name	DR Set # Data Request	Question No.	Question ID		Responses	Requestor	Date Received Fi	inal Date Due Date Sent	Links	Number of Attachements Attachment Links NDA Required?	WMP Section	Category	Subcategory
				Please provide a copy of each WMP-related document, submission, or report you submit to the 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	submission, as submitted to OEIS on March 6, 2023. Additionally, Liberty attempted to provide CalAdvocates with copies of its Q4 2022 Quarterly Data Report ("QDR") files on February 1, 2023. However, due to technical issues with the CPUC Kiteworks platform,			N/A		1			
CalAdvocates	1 CalAdvocates-Liberty-2023WMP-01	1	CalAdv-01-1.1	 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 context concerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP). Please provide a copy of your WMP pre-submission within two business days of its submission 	Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP	Aaron Louie	2/24/2023	N/A	CalAdvocates-Liberty-2023WMP-01_Liberty_ 23 Response_03082023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-01_Liberty_	1	WMP Pre-	Administrative	N/A
CalAdvocates	1 CalAdvocates-Liberty-2023WMP-01	2	CalAdv-01-1.2	to Energy Safety.Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reportsand 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	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 3/8/20	23 <u>Response 03082023.pdf (libertyutilities.com)</u> CalAdvocates-Liberty-2023WMP-01_Liberty_		Submission / WMP Pre-	Administrative	N/A
CalAdvocates	1 CalAdvocates-Liberty-2023WMP-01	3	CalAdv-01-1.3		Liberty will provide CalAdvocates with copies of responses to 2023 WMP discovery	Aaron Louie	2/24/2023	N/A	23 Response 03082023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-01_Liberty_		Submission /	Administrative	N/A
CalAdvocates	1 CalAdvocates-Liberty-2023WMP-01 2 2 3 3 4 4 5 4 5 4 6 4 7 4 7 4 8 4 9 4 10 4 <t< td=""><td>4</td><td>CalAdv-01-1.4</td><td>responses to WMP discovery requests issued by other entities. 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.</td><td>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 unsatisfactory 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 WMP 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</td><td>Aaron Louie</td><td>2/24/2023</td><td>3/8/20</td><td>23 Response_03082023.pdf (libertyutilities.com)</td><td></td><td></td><td>Administrative Grid Design, operations, and</td><td>N/A</td></t<>	4	CalAdv-01-1.4	responses to WMP discovery requests issued by other entities. 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 unsatisfactory 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 WMP 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	Aaron Louie	2/24/2023	3/8/20	23 Response_03082023.pdf (libertyutilities.com)			Administrative Grid Design, operations, and	N/A
CalAdvocates	2 CalAdvocates-Liberty-2023WMP-02	1	CalAdv-02-2.1	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.	to CalAdvocates by March 17, 2023. 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	Aaron Louie	2/24/2023	3/10/2023 3/10/20	CalAdvocates-Liberty-2023WMP-02_Liberty_ Response_03102023.pdf (libertyutilities.com)	6	r 8 r	naintenance (8.1). Vegetation Vanagement (8.2)	8.1.6, 8.2.5
CalAdvocates	2 CalAdvocates-Liberty-2023WMP-02	2	CalAdv-02-2.2		 provide this information to CalAdvocates by March 17, 2023. QC of Pole Clearing folder 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 3/10/20	CalAdvocates-Liberty-2023WMP-02_Liberty_ 23 Response_03102023.pdf (libertyutilities.com)		r	Grid Design, operations, and maintenance (8.1). Vegetation 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 		Aaron Louie	2/24/2023	3/10/2023 3/10/20	23 <u>CalAdvocates-Liberty-2023WMP-02_Liberty</u> 23 <u>Response_03102023.pdf (libertyutilities.com)</u>		12 1	Notices of Violation and Defect	N/A
CalAdvocates	2 CalAdvocates-Liberty-2023WMP-02	4	CalAdv-02-2.4	 e) Date that the violation was identified f) Date that the violation was corrected g) If the violation 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 violation in decimal degrees, truncated to seven decimal places j) Geographic longitude of violation in decimal degrees, truncated to seven decimal places. 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 	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Questions 1-4," Tab Q1 – Distribution.	Aaron Louie	2/24/2023	3/10/2023 3/10/20	CalAdvocates-Liberty-2023WMP-02_Liberty 23 Response_03102023.pdf (libertyutilities.com)		12 [Notices of Violation and Defect	N/A
				 c) Total circuit miles d) Circuit miles in Non-HFTD Areas e) Circuit miles in Other HFTD f) Circuit miles in Other HFTD Tier 2 g) Circuit miles in HFTD Tier 3 h) Circuit voltage i) Circuit SAIDI (System Average Interruption Duration Index) for 2021 j) Circuit SAIDI (System Average Interruption Duration Index) for 2022 k) Circuit SAIFI (System Average Interruption Frequency Index) for 2021 l) Circuit SAIFI (System Average Interruption Frequency Index) for 2021 m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2021 m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022 m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022 o) Total customer-minutes of de-energization on the circuit due to PSPS events in 2021 (sum of customer-minutes across all PSPS events). p) Total customer-minutes of de-energization on the circuit due to FSPS events in 2022 (sum of customer-minutes across all PSPS events). q) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. r) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2022. s) Number of trees that were worked on for EVM in Non-HFTD in 2021 t) Number of trees that were worked on for EVM in Other HFTD in 2021 v) Number of trees that were worked on for EVM in Other HFTD in 2022 w) Number of trees that were worked on for EVM in Other HFTD in 2022 w) Number of trees that were worked on for EVM in HFTD Tier 2 in 2021 x) Number of trees that were worked on for EVM in HFTD Tier 2 in 2021 					CalAdvocates-Liberty-2023WMP-03_Liberty_				
CalAdvocates	CalAdvocates-Liberty-2023WMP-03		CalAdv-03-3.1	were worked on for EVM in HFTD Tier 3 in 2021 Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that		Aaron Louie	2/24/2023	3/24/2023 3/29/20	<u>CalAdvocates-Liberty-2023WMP-03_Liberty</u> 23 <u>Response_03292023.pdf (libertyutilities.com)</u>		5,6	Electrical Infrastructure	5.2, 6.4.2
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	2	CalAdv-03-3.2	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	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Questions 1-4," Tab Q3 – Distribution Removals.	Aaron Louie	2/24/2023	3/24/2023 3/29/20	CalAdvocates-Liberty-2023WMP-03_Liberty_ Response_03292023.pdf (libertyutilities.com)	1	5, 6 6	Electrical Infrastructure	5.2, 6.4.3
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	3	CalAdv-03-3.3		Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Questions 1-4," Tab Q4 – Transmission Removals.	Aaron Louie	2/24/2023	3/24/2023 3/29/20	CalAdvocates-Liberty-2023WMP-03_Liberty_ 23 Response_03292023.pdf (libertyutilities.com)	1	8	ine Removal	8.1.2.9
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	4	CalAdv-03-3.4	e) Circuit miles removed or decommissioned in HFTD Tier 2 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 3/29/20	CalAdvocates-Liberty-2023WMP-03_Liberty_ 23 Response_03292023.pdf (libertyutilities.com)		8 1	ine removal	8.1.2.9

CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05		CalAdv-05-5.6	efer 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-2023WMP-05_Liberty Response Question 6b." Quarter 4 of 2022: a) Please provide a sample of 5 completed "Appendix A – Program Manager D) Please provide a sample of 5 completed "Appendix B – Senior Manager Annual Review Acknowledgment" forms. D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection" forms the D) Please provide a sample of 5 completed "Appendix C – Third Party Inspection"		Grid Design, operations, and maintenance (8.1)	
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	5	CalAdv-05-5.5	er changing training for inspectors? I) If the answer to part (c) is yes, please describe the actions that Liberty is taking as a result of ts asset inspection QA/QC reviews. e) Minor inconsistencies among inspections, no action is being taken at this time ts asset inspection QA/QC reviews. e) If the answer to part (c) is no, please explain why not. n response to Data Request CalAdvocates-Liberty-2023WMP-05, Liberty iberty stated "Liberty SQA/QC processes for asset inspections were developed for mplementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 05_Liberty Response Question 6a." 1022 after Quarter 1 and Quarter 2 detailed inspections are completed." The following questors is being taken at Review Acknowledgement form for 2022 1022 after Quarter 1 and Quarter 2 detailed inspections are completed." The following questors is being taken at Review Acknowledgement form for 2022 1022 after Quarter 1 and Quarter 2 detailed inspections are completed." The following questors is being taken at the followi	8	Grid Design, operations, and maintenance (8.1)	8.1.6
				iberty stated, "Liberty's QA/QC processes for asset inspections were developed for mplementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of ispect 0.5% of its 2022 detailed inspections, equating to 27 re-inspections. Of these, 24 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- 2023 MMP-05_Liberty Response Question 5 and 6." I) Please summarize the results of Liberty's asset inspection QA/QC reviews in 2022. Lad to any corrective actions or but the significant issues were captured by both inspections. I) Did Liberty's asset inspection QA/QC reviews in 2022 lead to any corrective actions or mprovements, such as performing re-inspections of certain assets, revising inspection protocols, d) None. I) Max and of its QA/QC processes for asset inspection sere inspection asset inspection contractive actions or support inspections are 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- 2023 MMP-05_Liberty Response Question 5 and 6." I) Please support inspection QA/QC reviews in 2022 lead to any corrective actions or but the significant issues were captured by both inspections. I) How issue as performing re-inspections of certain assets, revising inspection protocols, d) None. I) Max and II a			
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	4	CalAdv-05-5.3 CalAdv-05-5.4	All out the strached spreadsheet, CalAdvocates-Liberty-2023WMP-05_Attachment Tab 1, equest for marking your asset inspections in 2022. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 4/10/2023 Response_0410/2023, pdf (libertyutilities.com) 1 Please fill out the attached spreadsheet, CalAdvocates-Liberty-2023WMP-05_Liberty Response Question in 2022. Aaron Louie 2/24/2023 3/30/2023 4/10/2023 Response_0410/2023, pdf (libertyutilities.com) 1	8	N/A Grid Design, operations, and maintenance (8.1)	8.1.6
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	3	CalAdv-05-5.3	Provide a geodatabase file containing the outputs from your current wildfire risk model (i.e., probability of ignition multiplied by the consequence of ignition). Include the following attributes for each circuit segment: allowed for the 2023-2025 WMP pre-submission at the circuit-segment level. (This data model you are using for your 2023-2025 WMP filing), at the circuit-segment level. (This data model you are using for your 2023-2025 WMP filing), at the circuit-segment level. (This data model you are using for your 2023-2025 WMP filing), at the circuit-segment level. (This data model you current risk model is the 2023-2025 WMP pre-submission at the circuit-segment level. (This data model you current risk model is the previous question, but in GIS format.) Please provide, as line actualses circuit segments for which your current risk model is the previous question. Include the following attributes for each circuit segment: allowed for the 2023-2025 WMP pre-submission at the circuit-segment level. (This data model you current risk model is the previous question). Include the following attributes for each circuit segment: allowed for the 2023-2025 WMP pre-submission at the circuit-segment level. (This data for the 2023-2025 WMP pre-submission at the circuit-segment level. (This data for the previous question). Include the following attributes for each circuit segment: allowed for the previous question (the previous question). Include the following attributes for each circuit segment: allowed for the previous question. (This data for the previous question) is the previous question. (This data for the previous question). Include the following attributes for each circuit segment: allowed for the previous question. (This data for the previous question). (This data for the previous question). (This data for the previous question). (This data for the previous question) (This data for the previous question). (This data for the previous question) (This data for the previous question). (This data for the previous questio	6	N/A	N/A
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	2	CalAdv-05-5.2	Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing n) Consequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Farsh of the circuit-segment, according to the risk model you used for your 2022 WMP filing. N) Total wildfire risk score(5) for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Farsh of the circuit-segment, according to the risk model you used for your 2022 WMP filing. N) Total wildfire risk score(5) for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Farsh of the circuit-segment, according to the risk model you used for your 2022 WMP filing. N) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you are using or your 2022 ZMMP filing. Farsh of the circuit-segment, according to the risk model you are using or your 2022 ZMMP filing. N) Consequence of ignition score for the circuit-segment, according to the risk model you are Farsh Louie 2/24/2023 3/30/2023 4/10/2023 Response_04102003.pdf (libertyutilities.com)	6	N/A	N/A
				Nade vegeal of the source for the circuit segment is source you have any different and you have any different any different and you have any different any diffe			
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	1	CalAdv-05-5.1	a) h) of a fundary 1, 2022, have you identified transportation corridors within your service erritory where falling or failing lines or poles could currently limit egress and/or ingress during in emergency? b) If the answer to part (a) is yes, please describe how you identify such ransportation corridors. c) If available, please provide a geospatial data file that contains all current identified transportation corridors within ingress and egress hazards. rovide an Excel table of all distribution circuit-segments that traverse HFD areas (i.e., the egment has greater than zero circuit-miles in HFD) existing as of January 1, 2023. The Excel able should list each such circuit-segment as a row and include the following information in eparate columns. For items (n) and (r), please include all relevant risk scores, for example, endude eventation risk score, conductor risk scores, and any other driver-specific risk scores you	6	N/A	N/A
CalAdvocates	4 CalAdvocates-Liberty-2023WMP-04	4	CalAdv-04-4.4	wo times actual operating expenditures in 2022, please provide: a) The name of the initiative as 1-4," Tab Response 4. t 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 name of the initiative number in Table 12 of your 2022 WMP Update c) An explanation for the projected increase. Aaron Louie 2/24/203 3/24/203 3/24/203 3/24/203 8/10/203 Response 0.3312023.pdf (libertyutilities.com)	WMP Financials	N/A	N/A
CalAdvocates	4 CalAdvocates-Liberty-2023WMP-04	3	CalAdv-04-4.3	t is identified in your 2023-2025 WMP) The WMP Initiative number in Table 11 of your 2023-2025 WMP Update) The name of the initiative as it is identified in your 2022 WMP Update) The name of the initiative as it is identified in your 2022 WMP Update (1) The MMP Initiative number in Table 12 of your 2022 WMP Update (2) An explanation for the projected increase. Aaron Louie 2/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 3/24/2023 (3/31/202) (1) Another of the initiative as in addition of the projected increase. (2) A explanation for the projected increase. (3) Another of the initiative for which you forecast operating expenditures in 2024 to be at least (3) Another of the initiative as in addition of the projected increase. (4) Another of the initiative for which you forecast operating expenditures in 2024 to be at least (4) The name of the initiative as in addition of the projected increase. (4) Another of the initiative for which you forecast operating expenditures in 2024 to be at least (5) Another of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the initiative as in addition of the projected increase. (5) Another of the project	WMP Financials	N/A	N/A
CalAdvocates	4 CalAdvocates-Liberty-2023WMP-04	2	CalAdv-04-4.2	The name of the initiative as it is identified in your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in Table 12 of your 2022 WMP Update e) An explanation for the busines in 2023 to be at least in the supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions in 2022, please provide: a) The name of the initiatives in 2022, please provide: a) The name of the initiatives in 2022, please provide: a) The name of the initiatives in 2022, please provide: a) The name of the initiative of th	WMP Financials	N/A	N/A
CalAdvocates	4 CalAdvocates-Liberty-2023WMP-04	1	CalAdv-04-4.1	e) An explanation for the projected increase. Aaron Louie 2/24/202 3/24/202	WMP Financials	N/A	N/A
				For each WMP initiative for which you forecast capital expenditures in 2023 to be at least two imes actual capital expenditures in 2022, please provide: a) The name of the initiative as it is dentified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP Update b) The name of the initiative as it is identified in your 2022 WMP Update b) The name of the initiative as it is identified in your 2022 WMP Update b) The name of the initiative number in Table 12 of your 2022 WMP Update b) The WMP Initiative number in Table 12 of your 2022 WMP Update b) The WMP Initiative number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Update b) The work protection for the number in Table 12 of your 2022 WMP Up			N1 / 2
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	10	CalAdv-03-3.10) Undergrounding initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. () Distribution pole replacement.) Grid sectionalization () Detailed inspections of distribution assets) Detailed inspections of distribution assets () Detailed inspections of distribution assets) Aerial inspections of distribution assets () Aerial inspections of distribution assets () Aerial inspections of distribution assets () LiDAR inspections of distribution assets. () LiDAR inspections of distribution assets.	6	Risk Scoring	N/A
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	9	CalAdv-03-3.9	i) Distribution pole replacement p) Grid sectionalization p) Grid	6	Risk Scoring	N/A
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	8	CalAdv-03-3.8	Aaron Louie 2/24/2023 3/24/2023 3/29/2023 Response 0.3292023.pdf (libertyutilities.com) (li	6	Risk Scoring	IN/A
				b) Covered conductor installation by Luberty is explanating wildfire risk analysis, compliance requirements, and/or subject matter expertise. Luberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or Liberty is evaluating the results of differing wildfire risk assessments at the		Diek Seaving	NI / A
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	7	CalAdv-03-3.7	0. Undergrounding Ubberty is evaluating the results of differing wildfire risk assessments at the circuit and/or 1) Distribution pole replacement circuit segment level to plan and prioritize where it performs future work in 2024. For 2) Grid sectionalization additional information, refer to Section 5.7, Section 7.1.4, and individual 1) Aerial inspections of distribution assets initiative subsections of Liberty's 2023 WMP pre-submission. 1) Aerial inspections of distribution assets additonal information, refer to Section 5.7, Section 7.1.4, and individual 1) Aerial inspections of distribution assets initiative subsections of Liberty's 2023 WMP pre-submission. 1) UDAR inspections of distribution assets addit not perform overall wildfire risk scores at the circuit or circuit segment level dano Louie 2/24/203 3/24	6	Risk Scoring	N/A
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	6	CalAdv-03-3.6	A Arial inspections of transmission assets A arian Louie 2/24/2023 3/24/2023 3/29/2023 Response_03292023.pdf (liberty.utilities.com) A arian Louie A aria Louie A arian Louie	6	Risk Scoring	N/A
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	5	CalAdv-03-3.5	Age in processes Age in Louie 2/24/2023 3/24/2023 8/29/	6	Risk Scoring	N/A
				the trip of tr			

			Please augment Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 of 2022, which reports asset-related corrective notifications on electric circuits that were 7."	
			open at the end of the quarter. Add the following information in separate columns: a) Name of the associated circuit	
			b) ID number of the associated circuit c) Geographic latitude in decimal degrees, truncated to seven decimal places	Crid Design expertience and
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	7 Cal	d) Geographic longitude in decimal degrees, truncated to seven decimal placesCalAdvocates-Liberty-2023WMP-05_LibertyAdv-05-5.7e) Object/damage code or other description of defectAaron Louie2/24/20233/30/20234/10/2023Response_04102023.pdf (libertyutilities.com)Regarding Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 ofa) Yes.Image: CalAdvocates-Liberty-2023WMP-05_LibertyImage: CalAdvocates-Liberty-2023WMP-05_Liberty	Grid Design, operations, and 8 8 8
			2022: a) Do you have an internal system of identifying priority levels for corrective notifications b) Along with GO 95, Rule 18, Liberty uses its fire risk maps and asset condition codes to that differs from the priority levels specified in General Order 95, Rule 18? b) Along with GO 95, Rule 18, Liberty uses its fire risk maps and asset condition codes to assess the prioritization of corrective actions and replacements.	
			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? d) If the answer to the part (b) is yes, under what circumstances do you conduct re-inspections? assets that were inspected as part of its full system survey conducted in 2020.	
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	8 Cal	Additionally, the Job Facilitator's role may include verification of issues identified during an inspection. Additionally the Job Facilitator's role may include verification of issues identified during	Grid Design, operations, and 8 maintenance (8.1) 8.1.6
			Please provide a list of any incidents in 2022 where the actions of a VM contractor posed a Liberty did not experience any incidents in 2022 where the actions of a VM contractor safety risk to workers and/or the public. "Safety risk" here is defined as any occurrence on a posed a safety risk to workers or the public.	
			worksite where the contractor's behavior created a safety hazard for either workers or the general public. For each instance, please provide: a) The date you were informed of the safety <u>CalAdvocates-Liberty-2023WMP-06_Liberty</u>	Vegetation Management and
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	1 Cal/	Adv-06-6.1 b) The date that the original work that created the safety issue was performed Aaron Louie A/26/2023 4/19/2023 4/26/2023.pdf (libertyutilities.com) Provide your workplan that describes where and when you will perform system hardening on Refer to tab "2023" in supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty Image: CalAdvocates-Liberty-2023WMP-06_Liberty Image: CalAdvocates-Liberty-2023WMP-06_Liberty	8 Inspections (8.2) 8.2.7
			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 are expected to continue in 2023, or projects that are expected to be completed after 2023), please include the project and report the work what you t	
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	2 Cal	Adv-06-6.2 forecast will actually be performed in calendar year 2023. For each project, include the following Adv-06-6.2 Aaron Louie 2/24/2023 4/19/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com)	Grid Design, operations, and 8 8 8
			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 distribution circuits in 2024. For projects that you expect to partially complete in 2024 (i.e., Response Questions 2 and 3."	
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	3 (a)	that are expected to be completed after 2024), please include the project and report the work that you forecast will actually be performed in calendar year 2024. For each project, include the following information in separate columns, at a minimum; a) Order number Adv-06-6.3 Aaron Louie Algore A	Grid Design, operations, and 8 maintenance (8.1) 8.1.2
			For each of your 2023-2025 WMP system hardening initiatives, please provide disaggregated information related to expenditures and circuit miles treated in the attached table, Cal 4"	
			Advocates-Liberty-2023WMP-06_Attachment Tab 1. Add extra columns as needed. Note: for the purposes of this question, "line removal" refers to conductors that are permanently removed without replacement – for instance, as part of a remote grid project. This should be understood	Grid Design, operations, and
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	4 Cal	Adv-06-6.4 Aaron Louie 2/24/2023 4/19/2023 4/26/2023 4/26/2023 Action 10 instance, as part of a refined a project. This should be understood a contract of a should be understood at the should be und	8 maintenance (8.1) 8.1.2
			modeling capabilities with regard to PSPS decision-making ("PSPS circuit modeling capabilities"), performed at the beginning of this year by circuit. The PSPS risk decision-making including with what level of granularity they framework has not been developed and the model inputs currently do not incorporate grid hardening efforts or other changes to a line segment will grid hardening efforts and is a static study. The decision-making framework would have to	
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	5 Cal	affect PSPS thresholds.consider current PSPS thresholds affecting each circuit and any current PSPS mitigationCalAdvocates-Liberty-2023WMP-06_LibertyAdv-06-6.5b) Please describe any improvements to the present PSPS circuit modeling capabilities that youcontrols in place would also need to be factored in and calculated separately to supportAaron Louie2/24/20234/19/20234/26/2023Response 04262023.pdf (libertyutilities.com)	6 Risk Analysis Framework (6.2) N/A
			Identify any ignitions in 2022 associated with assets where you had an existing correctiveLiberty did not have any ignitions in 2022 associated with assets where it had an existingnotification at the time of the ignition. Please provide a spreadsheet listing each such ignitioncorrective notification at the time of the ignition(as rows) with the following information in separate columns: a) Unique ignition IDcorrective notification at the time of the ignition	
			b) Date of ignition c) Cause of ignition	Grid Design, operations, and
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	6 Cal/	Adv-06-6.6 d) Type of asset associated with the ignition Aaron Louie Aaron Louie Aaron Louie Aaron Louie Aaron Louie Aaron Louie 4/19/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com) (libertyutilities.com) (libertyutilities.com) (libertyutilities.com) (libertyutilities.com) (libertyutilities.com) (libertyutilities.com) (liberty conducted a wildfire risk assessment using the allowing its service territory (liberty conducted a wildfire risk assessment using the overlaid with the Social Vulnerability Index (SVI) and its current Reax wildfire risk (SVI) and its current Reax wildfire risk assessment using the overlaid with the Social Vulnerability Index (SVI) and its current Reax wildfire risk assessment using the service territory (structed a wildfire risk) (s	8 maintenance (8.1) 8.1.2
			assessment using the 85th percentile consequence calculation? polygons. Liberty provides an additional map in Appendix C of its 2023 WMP showing the b) What other wildfire risk assessments has Liberty conducted instead? SVI distribution, Liberty's updated utility risk analysis in its 2023 WMP, and major roads.	
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	1 Cal	Adv-07-7.1 Due to increased risk modeling requirements in the Office of Energy Infrastructure Safety (OEIS) 2023-2025 WMP Technical Guidelines. Liberty did not have enough time to analyze Talal Harahsheh 5/18/2023 5/23/2023 S/23/2023 CalAdvocates-Liberty-2023WMP-07_Liberty CalAdvocates-Liberty-2023WMP-07_Liberty Page 57 of Liberty's WMP states: a) No. b) No.	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 no b) N/A secondary egress, and one with limited egress. These sub-divisions consist mostly of single- c) Liberty completed mitigation actions during the 2020-2022 WMP cycle in limited egress 1	
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	2 Cal	family homes on flat land, surrounded by grass, trees, brush, and timber. In Placer County, CAL areas throughout its service territory. Mitigation actions were driven by existing decision- FIRE identified 21 subdivisions with no secondary egress, and three with limited egress. These making processes and risk analysis that did not consider egress. For an example of Adv-07-7.2 areas include a mix of single-family homes, townhomes, and duplexes surrounded by similar mitigation actions completed during the 2020-2022 WMP cycle in limited egress areas. Talal Harahsheh 5/18/2023 5/23/2023 S/23/2023 Response_05232023.pdf (libertyutilities.com)	5 Community Values at Risk (5.4) 5.4.3.3
			Page 60 of Liberty's WMP states, "Absentee landlords make notification requirements and a) Liberty uses a variety of methods for notifying customers of O&M activities: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 tob) Coor hangersb) Coor hangersb) Coor hangerscancellation entirely." a) Please describe what methods or strategies Liberty has adopted tob) Coor hangerscancellation entirely." a) Please describe what methods or strategies Liberty has adopted tocancellation entirely." b) Coor hangerscancellation entirely.cancellation entirely. <td></td>	
			ameliorate the problem noted above. • Mailed letters or postcards b) Please describe Liberty's method of maintaining accurate and up-to-date contact information • Social media posts	
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	3 Cal	Adv-07-7.3 for homeowners and renters in its service territory. • Email Page 60 of Liberty's WMP states, "Liberty is currently working with the [Tahoe Regional Planning ("MOU") for O&M activities to b) Liberty is in the process of executing an MOU with TRPA. The draft MOU is currently Talal Harahsheh 5/23/2023 5/23/2023 Response_05232023.pdf (libertyutilities.com) Image: 0.000 minipage: 0.0000 minipage: 0.00000 minipage: 0.0000 minipage: 0.0000 minipage: 0.0000	5 Community Values at Risk (5.4) 5.4.5
			allow minor repairs, replacements and vegetation maintenance to be completed without agency being reviewed by TRPA legal counsel and will then be sent back to Liberty for additional review and approval." a) To date, has Liberty executed an updated memorandum of review.	
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	4 Cal	understanding with Tahoe Regional Planning Agency? b) If the answer the part (a) above is CalAdvocates-Liberty-2023WMP-07_Liberty Adv-07-7.4 "no." please describe the status of developing an updated memorandum of understanding and Talal Harahsheh 5/18/2023 5/23/2023 5/23/2023.pdf (libertyutilities.com) Page 64 of Liberty's WMP states: a) Refer to Liberty's 2023 WMP for the analysis that Liberty completed in advance of its a) Refer to Liberty's 2023 WMP for the analysis that Liberty completed in advance of its b) b	5 Community Values at Risk (5.4) 5.4.5
			Although the current approach provides significant advancements over earlier efforts, it was 2023 WMP submission. Refer to the OEIS 2023-2025 Wildfire Mitigation Plan Technical neither reasonable nor feasible to conduct all the calculations and analyses provided in the Guidelines for the calculations and analysis provided in the guidelines.	
			2023-2025 Wildfire Mitigation Plan Technical Guidelines ("Technical Guidelines") prior to Liberty's 2023 WMP submission. Liberty, however, is committed to continuing to evolve and improve its risk modeling practices and intends to conduct the analyses and calculations insk analytics utilizing its Wildfire Risk Reduction Model ("WRRM"). Liberty received its	
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	5 Cal/	Adv-07-7.5 Talal Harahsheh 5/18/2023 5/23/2023 5/23/2023 7/23/2023 7/23/2023 7/23/2023 7/23/2023 Response_05232023.pdf (libertyutilities.com) first analytics during its when exist needed to the output included in the wildfire risk analysis though Liberty intends to conduct the analysis and calculations of future users and the results from WDPM included	6 Risk Methodology and Assessment 6
			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 assign weights to different customer categories (i.e., AFN/MBL, Commercial, Residential,	
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	6 Cal	attributes/characteristics would Liberty utilize to define "physical vulnerability"? Critical Facilities) based on physical vulnerability. b) Liberty maintains a list of MBL CalAdvocates-Liberty-2023WMP-07_Liberty Adv-07-7.6 b) What data does Liberty currently maintain or collect to measure physical vulnerability? customers and self-identified AFN customers. Talal Harahsheh 5/18/2023 5/23/2023 5/23/2023 Response_05232023.pdf (libertyutilities.com) Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Image: Collect to measure physical vulnerability is a list of MBL Im	6 Risk Methodology and Assessment 6.7
			failure for the period from 2020 to 2022 in any HFTD area. A sustained outage is an outage that 1." lasts for five or more minutes. The Excel sheet should list each outage as a row, with the 1	
CalAdvocates	8 CalAdvocates-Liberty-2023WMP-08	1 Cal	following information in columns: a) ID number of the circuit affected. b) Name of the circuit affected. c) Date of the outage. Adv-08-8.1 following information in columns: a) ID number of the circuit affected. adv-08-8.1	Grid Design, operations, and 8 maintenance (8.1)
			Page 70 of Liberty's WMP states that social vulnerability is not a factor currently included in a) With the final 2023 WMP technical guidelines issued approximately three months prior Liberty's wildfire risk analysis, though Liberty intends to incorporate it in its future risk modeling to submission of the 2023 WMP, Liberty was not able to incorporate social vulnerability and the constraints.	
			a) Please identify the constraint(s) that hindered the incorporation of social vulnerability prior b) Liberty plans to incorporate social vulnerability considerations in 2024 and report on this enhancement in its future WMP filings.	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	1 (24)	b) State when Liberty anticipates being able to include social vulnerability as part of Liberty's c) See Response 1b. 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? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process? (In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in the type of the	6 Risk Methodology and Assessment 6.
			Page 70 of Liberty's WMP states that physical vulnerability is not a factor currently included in a) Liberty's current fire science consultant, Dr. Chris Lautenberger, has advised Liberty that Liberty's wildfire risk analysis, though Liberty intends to incorporate it in its future risk modeling there is currently no validated generalized methodology that relates physical descent for the states physical for the states physical descent for the states physical descent for the states physical descent for the states physical for the states p	
			process. a) Please identify the constraint(s) that hindered the incorporation of physical characteristics of structures to their survivability in wildland fires. Put differently, it is understanding that fragility curves to quantify a structure's probability of being by State when Liberty anticipates being able to include physical vulnerability as part of Liberty's damaged or destroyed in a fire based on its physical characteristics do not exist.	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	2 Cal/	Adv-09-9.2 Fight modeling process. Fight modeling when Talal Harahsheh 5/26/2023 6/1/2023 6/1/2023.pdf (libertyutilities.com) Page 70 of Liberty's WMP states that coping capability is not a factor currently included in a) With the WMP technical guidelines issued approximately 3 months prior to submission Image: Comparison of the physical characteristics do not cause. Fight modeling when Talal Harahsheh 5/26/2023 6/1/2023 Response 06012023.pdf (libertyutilities.com) Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical characteristics do not cause. Image: Comparison of the physical cha	6 Risk Methodology and Assessment 6.1
			Liberty's wildfire risk analysis, though Liberty intends to incorporate it in its future risk modeling of the WMP completeness check, Liberty was not able to incorporate coping capacity into process. a) Please identify the constraint(s) that hindered the incorporation of coping capability prior to b) Liberty plans to incorporate coping capacity in 2024 and report on this enhancement in	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	3 Cal	Liberty's 2023 WMP submission.its future WMP filings.Adv-09-9.3b) State when Liberty anticipates being able to include coping capability as part of Liberty's riskc) See Response 3b.Talal Harahsheh5/26/20236/1/2023Response_06012023.pdf (libertyutilities.com)	6 Risk Methodology and Assessment 6.
			Page 70 of Liberty's WMP states the following factors are included as part of Liberty's wildfire a) Equipment/assets: GIS data are used to construct an ignition buffer surrounding is a construct an ignition buffer surrounding. Liberty's equipment and assets for use in fire spread modeling. b) Topography: Topography is an input to Liberty's fire spread modeling.	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	4 Cal	Please explain how each of these factors impacts Liberty's quantification of risk at the circuit level: Adv-09-9.4 a) Equipment/assets control assets control as a control asset to be the control of the	6 Risk Methodology and Assessment 6.
	9 CalAdvocates-Liberty-2023WWP-09		Adv-09-9.4 a) Fouring factors are included as part of Liberty's wildfire for the reasons stated below, no formal processes are currently in place to verify the risk analysis:	6 Risk Methodology and Assessment 6.
			 Equipment/assets, Equipment/assets: Liberty maintains internal GIS data for its equipment and assets. Topography, weather, vegetation, climate change, assets at risk: Liberty is an end user – 	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	5 Cal	Adv-09-9.5 Vegetation. Cases. Liberty uses open-source, widely-used, and industry standard data sets developed Talal Harahsheh 5/26/2023 6/1/2023 Response_06012023.pdf (libertyutilities.com) Page 71 of Liberty's WMP states that "Finally, Liberty also does not consider burn probability Liberty's fire risk modeling currently addresses only fires caused by its infrastructure. Image: Construction of these datasets developed Talal Harahsheh 5/26/2023 6/1/2023 Response_06012023.pdf (libertyutilities.com) Image: Constructure of these datasets developed Image: Constructure of	6 Risk Methodology and Assessment 6.
			from fires caused by sources other than utilities as in the Technical Guidelines." Impacts from other fires to Liberty's system is a grid resiliency issue that Liberty may Please explain why Liberty does not consider the burn probability from fires caused by sources address in the future after its utility-caused fire risk modeling has matured other than utilities.	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	6 Cal	Adv-09-9.6CalAdvocates-Liberty-2023WMP-09_LibertyTalal Harahsheh5/26/20236/1/20236/1/2023.pdf (libertyutilities.com)	6 Risk Methodology and Assessment 6.2
			Page 81 of Liberty's WMP, states "Overall utility risk is calculated by circuit from wildfire risk and PSPS risk,The sentence "Overall utility risk is calculated by circuit from wildfire risk and PSPS risk,PSPS risk, with an 80% weight to wildfire risk and 20% to PSPS risk."With an 80% weight to wildfire risk and 20% to PSPS risk" contains a typographical error. Ita) Please explain how Liberty arrived at the abovementioned specific weighting of wildfire riskshould read "Overall utility risk is calculated by summing wildfire risk and PSPS risk by	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	7	and PSPS risk. b) Has Liberty consulted with any agencies, universities, research groups, or other entities on the WMP from a previous draft.	6 Risk Methodology and Assessment 6.
		, Cal/	Page 96 of Liberty's WMP presents Table 6-7: Liberty Top-Risk Circuits, which provides risk scores a) Liberty works on multiple circuits simultaneously. for Liberty's top 20 risk-contributing circuits. With this context: b) Liberty plans to conduct grid design and system hardening work on 16 of the top 20 risk-	
			a) Does Liberty sequence its top risk circuit projects one by one according to the risk ranking or 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 and d) As stated in Section 7.2.2.3 of its 2023 WMP, Liberty does not yet have sufficient	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	8 Cal	Adv-09-9.8 System hardening projects for wildfire mitigation during the 2023-2025 WMP cycle? information to calculate the risk reductions for top-risk circuits and plans to develop an Talal Harahsheh 5/26/2023 6/1/2023 Response 06012023.pdf (libertyutilities.com) Page 96 of Liberty's WMP presents Table 6-7: Liberty Top-Risk Circuits, which provides risk scores Refer to file: CalAdvocates-Liberty-2023WMP-09_Liberty Response Question 9 Image: Calababababababababababababababababababa	6 Risk Methodology and Assessment 6.
			for Liberty's top 20 risk-contributing circuits. Please provide an Excel table that augments Table 6-7 with information about planned wildfire 1 mitigation measures on each circuit during the 2023-2025 WMP cycle. Specifically, the table	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	9 Cal	should add these new columns to Table 6-7:CalAdvocates-Liberty-2023WMP-09_LibertyAdv-09-9.9a) Brief description of grid design and system hardening work planned for wildfire mitigationTalal Harahsheh5/26/20236/1/20236/1/2023Response_06012023.pdf (libertyutilities.com)	6 Risk Methodology and Assessment 6.
			Pages 104-105 of Liberty's WMP states:a) Refer to file: CalAdvocates-Liberty-2023WMP-09_Liberty Response Question 10a for theIn late January 2023, Liberty signed a formal agreement with Direxyon to pilot its asset riskscope of work of the pilot project with Direxyon. Liberty provided data to Direxyon thatdecision-making solution to be incorporated, in part, in this WMP. If the pilot is successful forincluded GIS pole information and asset inspection information that was used to model	
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	10	the pole asset type and produces effective decision-making tools Liberty will continue building in service risk for pole assets. The information included, but was not limited to, pole age, out the risk-informed decision-making tools for multiple assets to better plan future pole type, date of last inspection, GO 165 condition findings, vegetation LiDAR clearance	6 Risk Methodology and Assessment 6.
			Page 107 of Liberty's WMP states "Liberty's strategy development for this WMP did not utilize b) Liberty plans on utilizing the wildfire risk scores developed by Reax."	
			a) Does Liberty plan on utilizing the wildfire risk scores developed by Reax to help plan future decisions regarding wildfire mitigation? b) If the answer to part (a) above is yes, when does Liberty plan on utilizing the wildfire risk informed decision-making assessment and monitoring to improve its overall risk $CalAdvocates-Liberty-2023WMP-09_Liberty$	Wildfire Mitigation Strategy
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	11 Cal/	Adv-09-9.11 Scores developed by Reax? reduction performance over time. Talal Harahsheh 5/26/2023 6/1/2023 Response_06012023.pdf (libertyutilities.com) On page 173 of its WMP, Liberty states that its 2022 target for Patrol Inspections of Distribution a) Liberty erroneously reported its target as the total overhead miles for its service Image: Control of	7 Development
			Electric Lines and Equipment was erroneously established at 706.3 miles, causing Liberty to missterritory. Liberty does not perform patrol inspections in areas where detailed inspectionsits 2022 inspection target by 203 miles. Please respond to the following:are being conducted and thus the target should have been a function of total overheada) Explain how Liberty mistakenly set a target of 706.3 miles. b) State the basis for why Libertymiles minus overhead detailed inspection miles.	
CalAdvocates	10 CalAdvocates-Liberty-2023WMP-10	1 Cal	a) Explain now Elderty instancing set a target of 700.5 miles. b) state the basis for why liberty inites milling optimiles. 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 Adv-10-10.1 complete in 2022). 6/1/2023 6/1/2023 6/2/2023 6/2/2023	Grid Design, operations, and8maintenance (8.1)8.1.3

CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	2	CalAdv-10-10.2
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	3	CalAdv-10-10.3
 CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	4	CalAdv-10-10.4
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	5	CalAdv-10-10.5
 CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	6	CalAdv-10-10.6
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	7	CalAdv-10-10.7
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	1	CalAdv-11-11.1
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	2	CalAdv-11-11.2
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	3	CalAdv-11-11.3
 CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	4	CalAdv-11-11.4
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	5	CalAdv-11-11.5
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	6	CalAdv-11-11.6
			0	CalAuv-11-11.0
 CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	7	CalAdv-11-11.7
 CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	8	CalAdv-11-11.8
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	9	CalAdv-11-11.9
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	1	CalAdv-12-12.1
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	2	CalAdv-12-12.2
	12		2	
 CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	3	CalAdv-12-12.3
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	4	CalAdv-12-12.4
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	5	CalAdv-12-12.5
CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	1	CalAdv-13-13.1
CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	2	CalAdv-13-13.2
	13	Lan around Liberty-2023 WIVIP-13	2	CaIAUV-13-13.2
CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	3	CalAdv-13-13.3
 CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	4	CalAdv-13-13.4
CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	5	CalAdv-13-13.5
CalAdvocates	14	CalAdvocates-Liberty-2023WMP-14	1	CalAdv-14-14.1
		CalAdvocatos Liberty 202010 pro-		
CalAdvocates	15	CalAdvocates-Liberty-2023WMP-15	1	CalAdv-15-15.1
CalAdvocates	15	CalAdvocates-Liberty-2023WMP-15	2	CalAdv-15-15.2
CalAdvocates	15	CalAdvocates-Liberty-2023WMP-15	3	CalAdv-15-15.3

			On page 174 of its WMP, Liberty states that it completed Quality Assurance and Quality Control						
			(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: a) How many individual asset inspections did Liberty conduct QA/QC on in 2022?	b) Yes. c) N/A d) 15 transmission (60 kV) and 9 distribution.					
y-2023WMP-10	2	CalAdv-10-10.2	 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 On page 182 of its WMP, Liberty states that it implemented its asset inspection QA/QC in 2022 	 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 a) The discrepancy is a typo. Liberty's QA/QC target for detailed asset inspections is 0.5%. 	Talal Harahsheh	5/26/2023	6/1/2023	6/2/2023 Response_06022023.pdf (libertyutilities.com)	
			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	b) N/A					
y-2023WMP-10	3	CalAdv-10-10.3	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 OA/OC of detailed asset inspections (0.005% on page 174 and 0.5% on page 182).	r	Talal Harahsheh	5/26/2023	6/1/2023	CalAdvocates-Liberty-2023WMP-10_Liberty 6/2/2023 Response_06022023.pdf (libertyutilities.com)	
				a) 24 b) Six re-inspections noted minor differences.					
			infractions during the re-inspections if differences were noted at all. Please respond to the following:	c) Examples include noting Level 3 differences such as foreign sign, loose secondary down guy, and auto splice 1" away from insulator.				CalAdvocates-Liberty-2023WMP-10_Liberty_	
y-2023WMP-10	4	CalAdv-10-10.4	a) How many third-party OA/OC checks were completed on detailed asset inspections in 2022? 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	a) Liberty halted its detailed inspections on January 1st, 2023, with the exception of detailed underground inspections due in 2023.	Talal Harahsheh	5/26/2023	6/1/2023	6/2/2023 Response_06022023.pdf (libertyutilities.com)	
			open work orders. Both contract crews and internal crews are working to expedite the process. Liberty also states that it "will halt its detailed inspections in order to catch up with its open	b) 40.3 circuit miles. c) Liberty has not completed detailed inspections yet in 2023.				CalAdvacates Liberty 2022W/MP 10 Liberty	
y-2023WMP-10	5	CalAdv-10-10.5	maintenance work orders and resume detailed inspections in 2024." <u>Please respond to the following:</u> On page 183 of its WMP, Liberty states: As of May 1, 2023, Liberty has halted its detailed	 d) Liberty is currently planning to resume its detailed inspections on January 1st, 2024. 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 	Talal Harahsheh	5/26/2023	6/1/2023	6/2/2023 <u>CalAdvocates-Liberty-2023WMP-10_Liberty</u> 6/2/2023 <u>Response_06022023.pdf (libertyutilities.com)</u>	
			inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and internal crews are working to expedite the process. Please respond to the following:	overlap of infractions found in its 2020 full system survey and prioritize repairs to infractions found during the system survey b) Liberty's full system survey completed in 2020 included all overhead lines that normally					
y-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.	are inspected over a five-year period. Liberty will remain compliant during 2023 without completing any overhead detailed inspections.	Talal Harahsheh	5/26/2023	6/1/2023	CalAdvocates-Liberty-2023WMP-10_Liberty_ 6/2/2023 Response_06022023.pdf (libertyutilities.com)	
			 a) Describe Liberty's current staffing resources allocated to each of the following items under asset management, including but not limited to: a. Inspections 	 a) Liberty's current staffing resources include: a. Inspections: Five internal inspectors and one contract inspector b. Maintenance: Four internal crews and three contract crews available 					
y-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 troublemen b) Liberty's current staffing has been sufficient to comply with regulatory requirements for asset management and inspection.	Talal Harahsheh	5/26/2023	6/1/2023	CalAdvocates-Liberty-2023WMP-10_Liberty 6/2/2023 Response 06022023.pdf (libertyutilities.com)	
			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			5,20,2020	0/ 1/ 2020		
			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-	
y-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	a) Liberty does not know the total number of discussion points that will be included in its	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023 2023WMP-11.pdf (libertyutilities.com)	
			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; 					
y-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. Pages 116-117 of Liberty's WMP identify the Topaz circuit as being in an area of elevated wildfire	 Impacts of significant weather (show and wind) on asser degradation and nearth. 	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023 <u>Liberty Response to DR CalAdvocates-Liberty-</u> 2023WMP-11.pdf (libertyutilities.com)	
			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:	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					
v-2023WMP-11	3	CalAdv-11-11.3	a) Does Liberty have any system hardening mitigation work planned in 2023 for the Topaz circuit listed above? b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit.	c) N/A	Talal Harahsheh	6/1/2023	6/6/2023	Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com)	
,			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	a) Yes. b) Liberty is replacing or repairing various poles on this circuit to address needs found			0,0,2020		
			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 circuit listed above?	during system surveys. c) N/A d) Yes. e) Liberty is replacing or repairing various poles on this circuit to address needs found				Liberty Response to DR CalAdvocates-Liberty-	
y-2023WMP-11	4	CalAdv-11-11.4	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	during system surveys. Liberty is also planning to do some system hardening on this a) Yes.	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023 2023WMP-11.pdf (libertyutilities.com)	
			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 Meyers	b) Liberty is planning to complete two covered conductor projects on Meyers circuits in 2023. Those projects are Celio A (1.6 miles) and Celio B (0.93 miles). Liberty will also complete 0.11 miles of undergrounding on the Cascade Project. Liberty is also replacing or					
y-2023WMP-11	5	CalAdv-11-11.5	circuit listed above? b) If the answer to part (a) above is ves, please identify the mitigation work selected for the	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)	
			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 vegetation portfolio and plans to expand this strategy to incorporate assets in the future."	During the 2023-2025 WMP cycle.					
202214/142 11	ć		When does Liberty anticipate it will have expanded its interim mitigation strategy to incorporate asset management measures, as referenced in the quote?			<i>c (1 (</i> 2222)	c (c (2022)	Liberty Response to DR CalAdvocates-Liberty-	
y-2023WMP-11	6	CalAdv-11-11.6	Page 128 of Liberty's WMP states, "Liberty is actively planning and executing wildfire mitigation initiatives while developing its risk based decision-making process."		Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023 2023WMP-11.pdf (libertyutilities.com)	
			a) Are any WMP activities or initiatives that Liberty is executing in 2023 based upon the abovementioned risk based decision-making process?	c) The abovementioned risk based decision-making process is not complete. Liberty used risk-based principles and tools (i.e., Reax risk map) to inform decision-making.				Liberty Response to DR CalAdvocates-Liberty-	
y-2023WMP-11	7	CalAdv-11-11.7	 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. Page 135 of Liberty's WMP states: 	a) Examples of evaluation criteria Liberty considered are cost, accuracy of risk	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023 2023WMP-11.pdf (libertyutilities.com)	
			In conjunction with this study, Liberty also plans to assess the asset risk reduction and vegetation risk reduction at an operational performance level utilizing IBM's work management	identification and model outputs, system compatibility, the feasibility of scenarios and 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.					
y-2023WMP-11	8	CalAdv-11-11.8	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 better assess operational risk to plan and adjust work activities for significant weather event	c) Liberty has decided to not move forward with IBM's proposed solution at this time.	Talal Harahsheh	6/1/2023	6/6/2023	Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com)	
			Page 138 of Liberty's WMP states: 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	 a) Liberty plans to have an initial risk-informed decision-making framework for overhead assets by August 2023. b) Liberty does not know the timeline for when all risk studies will be delivered. Liberty's 					
			risk studies to fully engage with internal subject matter experts to evaluate the results of the risk analyses.	wildfire risk modeling is an ongoing process that is informed by the results of current risk studies (i.e., Technosylva modeling results, Reax modeling results, Direxyon outputs), OEIS		- (- (- (- (Liberty Response to DR CalAdvocates-Liberty-	
y-2023WMP-11	9	CalAdv-11-11.9	a) When (i.e., month and year) does Liberty expect the development (referenced in the quote 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:	Hisk modeline sudelines, and conaborative discussions with stakeholders through	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023 2023WMP-11.pdf (libertyutilities.com)	
			 Risk assessment and modeling Grid design and system hardening 	b) See response 1a. c) See response 1b.				Call due astas Liberty 2022W/MD 12 Liberty	
y-2023WMP-12	1	CalAdv-12-12.1	 Asset management and inspections Vegetation management and inspections On p. 30 of its WMP, Liberty describes its planned spends for the 2023-2025 WMP cycle. Please 	a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023 <u>CalAdvocates-Liberty-2023WMP-12_Liberty</u> 6/9/2023 <u>Response_06092023.pdf (libertyutilities.com)</u>	
			provide a breakdown of the described proposed expenditures including at least the following categories: • Risk assessment and modeling	on March 8, 2023. b) See response 2a. c) See response 2b.					
y-2023WMP-12	2	CalAdv-12-12.2	Grid design and system hardening Asset management and inspections		Talal Harahsheh	6/6/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty_ 6/9/2023 Response_06092023.pdf (libertyutilities.com)	
			On pp. 201-202 of its WMP, Liberty provides Table 8-18: "Liberty Vegetation Inspections Targets by Year." Please explain why the row describing Liberty's Vegetation Targets by Year for the Initiative Activity "Program – LiDAR" is blank.	The blank row in Table 8-18 is a formatting error on the table carrying over from page 201 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					
y-2023WMP-12	3	CalAdv-12-12.3		page break.	Talal Harahsheh	6/6/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty_ 6/9/2023 Response 06092023.pdf (libertyutilities.com)	
y-2023 WINF-12	5		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	a) If Liberty VM field personnel are unable to perform their job function due to a		0/0/2023	0/ 3/ 2023	0/9/2023 Response_00092023.put (indertyutinties.com)	
			either a vegetation inspection or a vegetation maintenance activity. b) Please provide any internal protocols, handbooks, or other documents that describe the	Refusal Form document. If possible, the vegetation condition and vicinity to facilities should be photographed for reference and record keeping. Liberty VM field personnel (VM inspectors, VM workers) communicate the refusal as soon				CalAdvocates-Liberty-2023WMP-12 Liberty	
y-2023WMP-12	4	CalAdv-12-12.4	actions Liberty takes if a customer refuses access to his or her property for either a vegetation inspection or a vegetation maintenance activity. On p. 243 of its WMP, Liberty provides Table 8-31: "Past Due Vegetation Management Work	as possible to their immediate supervisor for resolution. Every effort should be made by a) Age refers to the date the work order was first created.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023 Response_06092023.pdf (libertyutilities.com)	
			Orders Categorized by Age." 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?	 b) Liberty details how work orders are prioritized based on risk and how mitigation 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 					
y-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.	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	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023 <u>CalAdvocates-Liberty-2023WMP-12_Liberty</u> 6/9/2023 <u>Response_06092023.pdf (libertyutilities.com)</u>	
			Please provide copies of the following documents: a) Corporate Emergency Management Plan (CEMP), dated April 27, 2022, referenced on p. 284 or your WMP	a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) f b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook					
v-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)	
			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_	
y-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 reduce the need for PSPS in certain areas." 	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	6/9/2023 Response_06092023.pdf (libertyutilities.com)	
			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					
y-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 Please provide a description of the weather conditions in which Liberty enables 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	6/9/2023 Response_06092023.pdf (libertyutilities.com)	
			 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 	conditions, temperature conditions, and moisture content. b) The area of Liberty service territory and weather conditions in any given year or month					
v-2023WMP-13	4	CalAdv-13-13.4	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 and wind conditions can be high.	Talal Harahsheh	6/6/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-13_Liberty 6/9/2023 Response_06092023.pdf (libertyutilities.com)	
, 20201111 20	·		On p. 162 of its WMP, Liberty states "Liberty will be expanding the 2022 Fast Trip, or SRP, pilot project because of its effectiveness"	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		0,0,2020	0,0,2020		
			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 2021" provides a value of 20244.00 for the Circuit Meyers 3300. Please explain if the pilot SRP	this a step further by removing reclosing and lowering the trip settings to a number that n impacts relay coordination and reduces incident energy on fault conditions, which in turn reduces ignition risk.				CalAdvocates-Liberty-2023WMP-13_Liberty_	
y-2023WMP-13	5	CalAdv-13-13.5	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	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	6/9/2023 Response_06092023.pdf (libertyutilities.com)	
			"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 time."	 Liberty considered factors including: cost; system compatibility, particularly the risk of moving forward with the solution prior to 					
y-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.	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 ignitions in 2020 and 2021 as 4.	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 2020 and 2021 as four.					
v-2023WMP-15	1	CalAdv-15-15.1			Talal Harahsheh	6/14/2023	6/19/2023	CalAdvocates-Liberty-2023WMP-15_Liberty_ 6/20/2023 Response_06202023.pdf (libertyutilities.com)	
, 2023 WIVIF-13	L	CarAuv-15-15.1	 a) How many reportable distribution ignitions did Liberty experience in 2020? b) How many reportable distribution ignitions did Liberty experience in 2021? 	a) One. b) Three.		0/ 14/ 2023	JJ 1J 2023		
			c) How many reportable distribution ignitions did Liberty experience in 2022?	c) One.				CalAdvocates-Liberty-2023WMP-15 Liberty	
y-2023WMP-15	2	CalAdv-15-15.2	Please provide an Excel sheet listing all ignitions that occurred on your system in 2020 through		Talal Harahsheh	6/14/2023	6/19/2023	6/20/2023 Response_06202023.pdf (libertyutilities.com)	
			2022. Each ignition should be a row. For each ignition, please provide the following columns of data: a) Date						
y-2023WMP-15	3	CalAdv-15-15.3	a) Date b) Circuit ID number c) Line Type (Distribution or Transmission)		Talal Harahsheh	6/14/2023	6/19/2023	CalAdvocates-Liberty-2023WMP-15_Liberty 6/20/2023 Response_06202023.pdf (libertyutilities.com)	

				On page 174 of its WMP, Liberty states that it completed Quality Assurance and Quality Control (QA/QC) on 0.0044% of its detailed asset inspections in 2022, while Liberty's target was to	a) 24 b) Yes.							
				QA/QC 0.0050% of the detailed asset inspections in 2022. Please respond to the following: a) How many individual asset inspections did Liberty conduct QA/QC on in 2022?	c) N/A d) 15 transmission (60 kV) and 9 distribution.			CalAdvocates-Liberty-2023WMP-10 Liberty_	1		Grid Design opporations and	
ocates	10 CalAdvocates-Liberty-2023WMP-10	2 0	CalAdv-10-10.2	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 On page 182 of its WMP, Liberty states that it implemented its asset inspection QA/QC in 2022	f) Liberty targeted 0.5% of detailed inspections as its OA/OC target as a starting point for Talal Harahsh	nsheh 5/26/2023	6/1	L/2023 6/2/2023 Response_06022023.pdf (libertyutilities.com)		8	Grid Design, operations, and maintenance (8.1)	8.1.3
				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	b) N/A							
ocates	10 CalAdvocates-Liberty-2023WMP-10	3 0		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 OA/OC of detailed asset inspections (0.005% on page 174 and 0.5% on page 182).	Talal Harahsh	nsheh 5/26/2023	6/1	L/2023 6/2/2023 Response 06022023.pdf (libertyutilities.com)		8	Grid Design, operations, and maintenance (8.1)	8.1.6
				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) 24 b) Six re-inspections noted minor differences.	5, 20, 2023				ŭ		
				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.	c) Examples include noting Level 3 differences such as foreign sign, loose secondary down guy, and auto splice 1" away from insulator.						Grid Docign according	
ocates	10 CalAdvocates-Liberty-2023WMP-10	4 C	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 Harahsh a) Liberty halted its detailed inspections on January 1st, 2023, with the exception of	nsheh 5/26/2023	6/1	L/2023 6/2/2023 CalAdvocates-Liberty-2023WMP-10_Liberty Besponse_06022023.pdf (libertyutilities.com)		8	Grid Design, operations, and maintenance (8.1)	8.1.6
				As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of								
				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	
cates	10 CalAdvocates-Liberty-2023WMP-10	5 C		Please respond to the following: On page 183 of its WMP, Liberty states: As of May 1, 2023, Liberty has halted its detailed	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	nsheh 5/26/2023	6/1	L/2023 6/2/2023 Response_06022023.pdf (libertyutilities.com)		8	maintenance (8.1)	8.1.7
				internal crews are working to expedite the process.	overlap of infractions found in its 2020 full system survey and prioritize repairs to infractions found during the system survey							
cates	10 CalAdvocates-Liberty-2023WMP-10	6 0	CalAdv-10-10.6	Please respond to the following: 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.	b) Liberty's full system survey completed in 2020 included all overhead lines that normally are inspected over a five-year period. Liberty will remain compliant during 2023 without completing any overhead detailed inspections.	nsheh 5/26/2023	6/1	L/2023 6/2/2023 <u>Response_06022023.pdf</u> (libertyutilities.com)		8	Grid Design, operations, and maintenance (8.1)	8.1.7
				a) Describe Liberty's current staffing resources allocated to each of the following items under asset management, including but not limited to:			·					
				a. Inspections b. Maintenance	 b. Maintenance: Four internal crews and three contract crews available c. Open work orders and other: Same as above plus five internal troublemen 			CalAdvacates Liberty 2022WMP 10 Liberty				
cates	10 CalAdvocates-Liberty-2023WMP-10	7 C	CalAdv-10-10.7	 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 Page 109 of Liberty's WMP states that "Liberty sought to separately strategize future risk model 	b) Liberty's current staffing has been sufficient to comply with regulatory requirements for asset management and inspection. a) Yes.	nsheh 5/26/2023	6/1	CalAdvocates-Liberty-2023WMP-10_Liberty 6/2/2023 6/2/2023 Response_06022023.pdf (libertyutilities.com)				
				refinements and approaches by onboarding new vendors to help develop a formal risk model 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-				
cates	11 CalAdvocates-Liberty-2023WMP-11	<u> 1 </u>		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		nsheh 6/1/2023	6/6	5/2023 6/6/2023 2023WMP-11.pdf (libertyutilities.com)		7	Risk Evaluation (7.1)	7.1.1
				a) What is the total number of "discussion points" that Liberty will plot on Figure 7-1 while	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;							
ates	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 Harahsh 	nsheh 6/1/2023	6/6	Liberty Response to DR CalAdvocates-Liberty-6/6/20232023WMP-11.pdf (libertyutilities.com)		77	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	a) Yes. b) Liberty is completing traditional overhead hardening on three projects in 2023. Those							
				a) Does Liberty have any system hardening mitigation work planned in 2023 for the Topaz circuit	projects are Cunningham Lane, Eastside Lane, Larsen Lane. Liberty is also replacing or repairing various poles on this circuit to address needs found during system surveys.			Liberty Response to DR CalAdvocates-Liberty-				
ates	11 CalAdvocates-Liberty-2023WMP-11	3 C	CalAdv-11-11.3	listed above? b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit. Pages 116-117 of Liberty's WMP identify the Muller circuit as being in an area of elevated	c) N/A d) Yes. a) Yes.	nsheh 6/1/2023	6/6	5/2023 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:	b) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys. c) N/A							
ator				a) Does Liberty have any system hardening mitigation work planned in 2023 for the Muller circuit listed above?	d) Yes. e) Liberty is replacing or repairing various poles on this circuit to address needs found	acheh		Liberty Response to DR CalAdvocates-Liberty-		_	Diele Frankrisk (* 20	7 4 2
ates	11 CalAdvocates-Liberty-2023WMP-11	4 C	CalAdv-11-11.4	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 wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score	during system surveys. Liberty is also planning to do some system hardening on this Talal Harahsh a) Yes. b) Liberty is planning to complete two covered conductor projects on Meyers circuits in	nsheh 6/1/2023	6/6	5/2023 6/6/2023 2023WMP-11.pdf (libertyutilities.com)		7	Risk Evaluation (7.1)	/.1.3
				and used older studies to support this WMP. With this context:	b) Liberty is planning to complete two covered conductor projects on Meyers circuits in 2023. Those projects are Celio A (1.6 miles) and Celio B (0.93 miles). Liberty will also complete 0.11 miles of undergrounding on the Cascade Project. Liberty is also replacing or							
ates	11 CalAdvocates-Liberty-2023WMP-11	5 0	CalAdv-11-11.5	circuit listed above? b) If the answer to part (a) above is ves, please identify the mitigation work selected for the	repairing various poles on these circuits to address needs found during system surveys. c) N/A Talal Harahsh	nsheh 6/1/2023	6/6	Liberty Response to DR CalAdvocates-Liberty-6/6/20232023WMP-11.pdf (libertyutilities.com)		7	Risk Evaluation (7.1)	7.1.3
				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.							
				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 asset management measures, as referenced in the quote?				Liberty Response to DR CalAdvocates-Liberty-				
ates	11 CalAdvocates-Liberty-2023WMP-11	6 C	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	Talal Harahsh a) No.	nsheh 6/1/2023	6/6	5/2023 6/6/2023 2023WMP-11.pdf (libertyutilities.com)		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							
rates	11 CalAdvocates-Liberty-2023WMP-11	7	alady 11 11 -	b) If the answer to part (a) is yes, please explain which activities or initiatives in 2023 flow from	risk-based principles and tools (i.e., Reax risk map) to inform decision-making.	nsheh 6/1/2023		<u>Liberty Response to DR CalAdvocates-Liberty-</u> 6/6/2023 2023WMP-11 pdf (libertyutilities com)		_	Risk Evaluation (7.1)	714
ates		/ C		the risk based decision-making process. Page 135 of Liberty's WMP states: In conjunction with this study, Liberty also plans to assess the asset risk reduction and	Talal Harahsh a) Examples of evaluation criteria Liberty considered are cost, accuracy of risk identification and model outputs, system compatibility, the feasibility of scenarios and	6/1/2023	6/6	5/2023 6/6/2023 2023WMP-11.pdf (libertyutilities.com)			INISK EVALUATION (7.1)	/.1.4
				vegetation risk reduction at an operational performance level utilizing IBM's work management	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.							
ates	11 CalAdvocates-Liberty-2023WMP-11	8 C	CalAdv-11-11.8	integrate asset risk and detailed vegetation risk scores to help asset and vegetation managers better assess operational risk to plan and adjust work activities for significant weather event	c) Liberty has decided to not move forward with IBM's proposed solution at this time. Talal Harahsh	nsheh 6/1/2023	6/6	5/2023 6/6/2023 Liberty Response to DR CalAdvocates-Liberty- 2023WMP-11.pdf (libertyutilities.com)		7	Risk Evaluation (7.1)	7.2.2
				Page 138 of Liberty's WMP states: Liberty's risk-informed decision-making framework is under development. Liberty's engineering,								
					b) Liberty does not know the timeline for when all risk studies will be delivered. Liberty's wildfire risk modeling is an ongoing process that is informed by the results of current risk studies (i.e., Technosylva modeling results, Reax modeling results, Direxyon outputs), OEIS			Liberty Response to DR CalAdvocates-Liberty-				
ates	11 CalAdvocates-Liberty-2023WMP-11	9 C	CalAdv-11-11.9	a) When (i.e., month and year) does Liberty expect the development (referenced in the quote On pp. 29-30 of its WMP, Liberty describes its actual WMP spends for the 2020-2022 cycle. Please	risk modeling guidelines, and collaborative discussions with stakeholders through Talal Harahsh a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS	nsheh 6/1/2023	6/6	6/2023 6/6/2023 2023WMP-11.pdf (libertyutilities.com)		7	Risk Evaluation (7.1)	7.2.3
				Risk assessment and modeling	on March 8, 2023. b) See response 1a.							
cates	12 CalAdvocates-Liberty-2023WMP-12	1	CalAdv-12-12.1	 Grid design and system hardening Asset management and inspections Vegetation management and inspections 	c) See response 1b. Talal Harahsh	nsheh 6/6/2023	E la	CalAdvocates-Liberty-2023WMP-12_Liberty 6/9/2023 Response 06092023.pdf (libertyutilities.com)		Л	Proposed Expenditures (4.3)	
		C		 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	0/0/2023	0/5					
				categories:Risk assessment and modeling	b) See response 2a. c) See response 2b.							
ates	12 CalAdvocates-Liberty-2023WMP-12	2 0	CalAdv-12-12.2	Grid design and system hardening Asset management and inspections	Talal Harahsh	nsheh 6/6/2023	6/9	O/2023 CalAdvocates-Liberty-2023WMP-12_Liberty O/2023 6/9/2023 Response_06092023.pdf (libertyutilities.com)		4	Proposed Expenditures (4.3)	
				On pp. 201-202 of its WMP, Liberty provides Table 8-18: "Liberty Vegetation Inspections Targets by Year." Please explain why the row describing Liberty's Vegetation Targets by Year for the Initiative Activity "Program – LiDAR" is blank.	The blank row in Table 8-18 is a formatting error on the table carrying over from page 201 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-Liberty-2023WMP-12_Liberty_			Vegetation Management and	
ates	12 CalAdvocates-Liberty-2023WMP-12	3 C	CalAdv-12-12.3		Talal Harahsh a) If Liberty VM field personnel are unable to perform their job function due to a	nsheh 6/6/2023	6/9	9/2023 6/9/2023 Response_06092023.pdf (libertyutilities.com)		8	Inspections (8.2)	8.2.1.2
					Refusal Form document. If possible, the vegetation condition and vicinity to facilities							
ates	12 CalAdvocates-Liberty-2023WMP-12	4	CalAdv-12-12.4	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 inspection or a vegetation maintenance activity.	should be photographed for reference and record keeping. Liberty VM field personnel (VM inspectors, VM workers) communicate the refusal as soon as possible to their immediate supervisor for resolution. Every effort should be made by Talal Harahsh	nsheh 6/6/2023	6/9	CalAdvocates-Liberty-2023WMP-12_Liberty 9/2023 6/9/2023 Response_06092023.pdf (libertyutilities.com)		8	Vegetation Management and Inspections (8.2)	8.2.2
				On p. 243 of its WMP, Liberty provides Table 8-31: "Past Due Vegetation Management Work Orders Categorized by Age."	a) 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		0					
				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						Vogotatian Maria	
cates	12 CalAdvocates-Liberty-2023WMP-12	5 C	CalAdv-12-12.5	181+ davs.	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 Talal Harahsh a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP)	nsheh 6/6/2023	6/9	CalAdvocates-Liberty-2023WMP-12_Liberty 6/9/2023 6/9/2023 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 of your WMP	a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook							
				b) Liberty Utilities Public Safety Power Shutoff Playbook, dated June 13, 2022, referenced on p. 284 of your WMP				CalAdvocates-Liberty-2023WMP-13_Liberty_				
ates	13 CalAdvocates-Liberty-2023WMP-13	1 C	CalAdv-13-13.1	On p. 311 of its WMP, Liberty states "NV Energy is the [Transmission Owner] for Liberty A	a) Yes.	nsheh 6/6/2023	6/9	0/2023 6/9/2023 Response_06092023.pdf (libertyutilities.com)		8	Emergency Preparedness (8.4)	8.4.2
				specific plan for communicating with NV Energy including the information to be provided is included in the Liberty CEMP"	b) N/A 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.				1			
ates	13 CalAdvocates-Liberty-2023WMP-13	2	CalAdv-13-13.2	 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) Please describe Liberty's plan in the event of de-energization of its circuits by NV Energy. 	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- energizations," overbroad, unduly burdensome, and not reasonably calculated to lead to Talal Harahsh	nsheh 6/6/2023	6/9	O/2023 CalAdvocates-Liberty-2023WMP-13_Liberty_ O/2023 6/9/2023		8	Emergency Preparedness (8.4)	8.4.3.2
				On p. 162 of its WMP, Liberty states "[T]hese programs, in particular Liberty's SRP program, may reduce the need for PSPS in certain areas."	a) Liberty's SRP program is not currently impacting Liberty's PSPS protocols. In 2023, Liberty is working with University of Nevada, Reno (UNR) to develop the SRP settings and							
				b) Please describe the decision-making process for a situation in which Liberty anticipates PSPS				CalAdvocates-Liberty-2023WMP-13 Liberty_			Grid Design operations and	
ates	13 CalAdvocates-Liberty-2023WMP-13	З С	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 Please provide a description of the weather conditions in which Liberty enables 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 Harahsh a) Various weather conditions influence the SRP decision process, including wind	nsheh 6/6/2023	6/9	6/9/2023 6/9/2023 Response 06092023.pdf (libertyutilities.com)		8	Grid Design, operations, and maintenance (8.1)	8.1.2.6
				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	conditions, temperature conditions, and moisture content. b) The area of Liberty service territory and weather conditions in any given year or month							
				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			CalAdvocates-Liberty-2023WMP-13_Liberty		-	Grid Design, operations, and	
ates	13 CalAdvocates-Liberty-2023WMP-13	4 C	CalAdv-13-13.4		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	nsheh 6/6/2023	6/9	9/2023 6/9/2023 <u>Response_06092023.pdf (libertyutilities.com)</u>		8	maintenance (8.1)	8.1.2.6
					Liberty utilized "wildfire mode" settings which removes reclosing. The SRP program takes 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							
ates	13 CalAdvocates-Liberty-2023WMP-13	5 C	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.	reduces ignition risk. b) In 2022, Liberty utilized a mix of SRP settings and "wildfire mode" settings because the Talal Harahsh	nsheh 6/6/2023	6/9	CalAdvocates-Liberty-2023WMP-13_Liberty 9/2023 6/9/2023 Response_06092023.pdf (libertyutilities.com)		8	Grid Design, operations, and maintenance (8.1)	8.1.2.6
				Liberty's response to question 8 of data request CalAdvocates-Liberty-2023WMP-11 discusses an "IBM Maximo project" and when the platform would be complete and operational. Liberty's	a) In its evaluation of whether to move forward with the proposed solution from IBM, Liberty considered factors including:							
					• system compatibility, particularly the risk of moving forward with the solution prior to			CalAdvocates-Liberty-2023WMP-14 Liberty_				
cates	14 CalAdvocates-Liberty-2023WMP-14	1 0		a) Please explain why Liberty has decided not to move forward with the proposed solution from IBM to consolidate its risk data sources. Please explain why your QDR for Q1 of 2022 reports the total number of distribution ignitions in	• the ability to operationalize model outputs. Talal Harahsh	nsheh 6/8/2023	6/13	CalAdvocates-Liberty-2023WMP-14_Liberty 8/2023 6/13/2023 Response_06132023.pdf (libertyutilities.com)				
				2020 and 2021 as 26, but your QDR for Q2 of 2022 reports the total number of distribution	Liberty's QDR for Q1 of 2023 correctly reports the total number of distribution ignitions in 2020 and 2021 as four.							
								CalAdvocates-Liberty-2023WMP-15 Liberty				
cates	15 CalAdvocates-Liberty-2023WMP-15	<u> 1 </u>	CalAdv-15-15.1	a) How many reportable distribution ignitions did Liberty experience in 2020?	a) One.	nsheh 6/14/2023	6/19	0/2023 6/20/2023 Response_06202023.pdf (libertyutilities.com)				
				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.							
cates	15 CalAdvocates-Liberty-2023WMP-15	2	CalAdv-15-15.2		Talal Harahsh	nsheh 6/14/2023	6/19	O/2023 CalAdvocates-Liberty-2023WMP-15_Liberty O/2023 Response_06202023.pdf (libertyutilities.com)				
			<u> </u>	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: a) Date				CalAdvacates liberty 202214040 45 111 1	1			
cates	15 CalAdvocates-Liberty-2023WMP-15	З С	CalAdv-15-15.3	b) Circuit ID number c) Line Type (Distribution or Transmission)	Talal Harahsh	nsheh 6/14/2023	6/19	CalAdvocates-Liberty-2023WMP-15_Liberty0/20236/20/2023Response_06202023.pdf (libertyutilities.com)				

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	Green Power Institute	1	GPI-Liberty-2023WMP-01	1

GPI-01-1.1

Please provide Liberty's Pre-submission 2023-2025 WMP Base Plan filed on March 6, 2023, with the OEIS per the 2023 WMP Guidelines and Schedule document. Including all attachments and associated supporting documents required for the Pre-submission 2023-2025 WMP Base Plan	Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP pre-submission.	
filing.		Greg

MP				<u>GPI_Liberty_2023WMP_01_Liberty_</u> <u>Response_03082023.pdf (libertyutilities.com)</u>	1	
Gregg Morris	3/6/2023	3/9/2023	3/8/2023	Response_03082023.pdf (libertyutilities.com)		

WMP Pre-			
Submission	Administrative	N/A	