

Liberty 2023 WMP Discovery Log

Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question	Response	Requestor	Date Received	Final Date Due	Date Sent	Links	Number of Attachments	Attachment Links	NDA Required?	WMP Section	Category	Subcategory
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	1	CalAdv-01-1.1	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 CalAdvocates within one business day of the document's submission to Energy Safety. If you have submitted the document to Energy Safety in 2023 prior to this data request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this data request. This request is limited to materials or documents that (1) are related to work plans, initiative targets, risk models, risk spend efficiency (RSE) calculations, or WMP change orders; and (2) are provided to Energy Safety to provide additional details or context concerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP).	Refer to attachment: "2023-03-06_Liberty_2023_WMP-RO" for Liberty's 2023 WMP pre-submission, as submitted to OIEs 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, Liberty was not able to provide copies of these files until February 9, 2023.	Aaron Louie	2/24/2023	N/A	3/8/2023	CalAdvocates-Liberty-2023WMP-01_Liberty-Response-03082023.pdf (libertyutilities.com)	1			WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	2	CalAdv-01-1.2	Please provide a copy of your WMP pre-submission within two business days of its submission to Energy Safety.	Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	N/A	3/8/2023	CalAdvocates-Liberty-2023WMP-01_Liberty-Response-03082023.pdf (libertyutilities.com)	1			WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	3	CalAdv-01-1.3	Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but not limited to all PDFs, spatial data files, non-spatial data files, and confidential attachments) on the same business day that the document is sent to Energy Safety.	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, Liberty was not able to provide copies of these files until February 9, 2023.	Aaron Louie	2/24/2023	N/A	3/8/2023	CalAdvocates-Liberty-2023WMP-01_Liberty-Response-03082023.pdf (libertyutilities.com)				WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	4	CalAdv-01-1.4	Provide a copy of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the issuer of the discovery request. This includes: a) Confidential responses to WMP discovery requests issued by Energy Safety; b) Confidential responses to WMP discovery requests issued by other entities.	Liberty will provide CalAdvocates with copies of responses to 2023 WMP discovery requests made by Energy Safety and other entities.	Aaron Louie	2/24/2023	N/A	3/8/2023	CalAdvocates-Liberty-2023WMP-01_Liberty-Response-03082023.pdf (libertyutilities.com)				WMP Pre-Submission	Administrative	N/A
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	1	CalAdv-02-2.1	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by 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 verifications 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 to CalAdvocates by March 17, 2023.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	CalAdvocates-Liberty-2023WMP-02_Liberty-Response-03102023.pdf (libertyutilities.com)	6			8	Grid Design, operations, and maintenance (8.2) Vegetation Management (8.2)	8.1.6, 8.2.5
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	2	CalAdv-02-2.2	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by external entities that were completed since January 1, 2022, and that examined any programs, initiatives, or strategies described in your 2022 WMP Update. External entities include, but are not limited to, consultants, contractors, auditors, court-appointed monitors, and Independent Evaluators.	Refer to the following vegetation management files and folders in the Supporting Materials email for this data request response sent to CalAdvocates through the CPUC Kiteworks system: "2022_VM_OC_Pass_Results_Report.xlsx", "TAM700_LIDAR_Work_OC_Corrective_Action.xlsx", "QC of Completed Work folder", "QC of Inspections folder. Liberty is in the process of collecting QA/QC materials completed as part of its asset inspections QA/QC program in 2022. Liberty plans to provide this information to CalAdvocates by March 17, 2023.", "QC of Pole Clearing folder", "Dead tree audit 7 22 folder".	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	CalAdvocates-Liberty-2023WMP-02_Liberty-Response-03102023.pdf (libertyutilities.com)				8	Grid Design, operations, and maintenance (8.1) Vegetation Management (8.2)	8.1.6, 8.2.5
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	3	CalAdv-02-2.3	Provide an Excel table of all defects in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns: a) Associated circuit name b) Defect type c) Description of defect d) 2022 WMP initiative (from your 2022 WMP update) associated with defect e) Date that the defect was identified f) Date that the defect was corrected g) If the defect has not yet been corrected as of the issuance date of this data request, a brief explanation. h) Priority level of corresponding corrective tag i) Geographic latitude of defect in decimal degrees, truncated to seven decimal places j) Geographic longitude of defect in decimal degrees, truncated to seven decimal places.	Liberty did not receive any Notices of Defects from Energy Safety in 2022.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	CalAdvocates-Liberty-2023WMP-02_Liberty-Response-03102023.pdf (libertyutilities.com)				12	Notices of Violation and Defect	N/A
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	4	CalAdv-02-2.4	Provide an Excel table of all violations in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns: a) Associated circuit name b) Violation type c) Description of violation d) 2022 WMP initiative (from your 2022 WMP update) associated with violation e) Date that the violation was identified f) Date that the violation was corrected 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.	Liberty did not receive any Notices of Violations from Energy Safety in 2022.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	CalAdvocates-Liberty-2023WMP-02_Liberty-Response-03102023.pdf (libertyutilities.com)				12	Notices of Violation and Defect	N/A
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	1	CalAdv-03-3.1	Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns: a) Circuit name b) Circuit ID number c) Total circuit miles d) Circuit miles in Non-HFTD Areas e) Circuit miles in Other HFTD f) Circuit miles in 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 2022 m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2021 n) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022 o) Total customer-minutes of de-energization on the circuit due to PSE events in 2021 (sum of customer-minutes across all PSE events). p) Total customer-minutes of de-energization on the circuit due to PSE events in 2022 (sum of customer-minutes across all PSE 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 Non-HFTD in 2022 u) 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 HFTD Tier 2 in 2021 x) Number of trees that were worked on for EVM in HFTD Tier 2 in 2022 y) Number of trees that were worked on for EVM in HFTD Tier 3 in 2021 z) Number of trees that were worked on for EVM in HFTD Tier 3 in 2022.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q1 - Distribution.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292023.pdf (libertyutilities.com)	1			5, 6	Electrical Infrastructure	5.2, 6.4.2
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	2	CalAdv-03-3.2	Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns: a) Circuit name b) Circuit ID number c) Total circuit miles d) Circuit miles in Non-HFTD Areas e) Circuit miles in Other HFTD f) Circuit miles in HFTD Tier 2 g) Circuit miles in HFTD Tier 3 h) Circuit voltage i) Total customer-minutes of de-energization on the circuit due to PSE events in 2021 (sum of customer-minutes across all PSE events). j) Total customer-minutes of de-energization on the circuit due to PSE events in 2022 (sum of customer-minutes across all PSE events). k) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. l) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2022. m) Number of support structures replaced in Non-HFTD in 2021 n) Number of support structures replaced in Non-HFTD in 2022 o) Number of support structures replaced in Other HFTD in 2021 p) Number of support structures replaced in Other HFTD in 2022 q) Number of support structures replaced in HFTD Tier 2 in 2021 r) Number of support structures replaced in HFTD Tier 2 in 2022 s) Number of support structures replaced in HFTD Tier 3 in 2021 t) Number of support structures replaced in HFTD Tier 3 in 2022 u) Miles of LIDAR inspection in Non-HFTD in 2021 v) Miles of LIDAR inspection in Non-HFTD in 2022 w) Miles of LIDAR inspection in Other HFTD in 2021 x) Miles of LIDAR inspection in Other HFTD in 2022.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q2 - Transmission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292023.pdf (libertyutilities.com)	1			5, 6	Electrical Infrastructure	5.2, 6.4.2
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	3	CalAdv-03-3.3	Provide an Excel table of all transmission circuits existing as of January 1, 2022, that were removed or decommissioned in 2022, either partially or entirely (as rows). This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns: a) Circuit name b) Circuit ID number c) Circuit miles removed or decommissioned in Non-HFTD Areas d) Circuit miles removed or decommissioned in Other HFTD e) Circuit miles removed or decommissioned in HFTD Tier 2 f) Circuit miles removed or decommissioned in HFTD Tier 3 g) Reason(s) for removal or decommissioning.	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	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292023.pdf (libertyutilities.com)	1			8	Line Removal	8.1.2.9
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	4	CalAdv-03-3.4	Provide an Excel table of all transmission circuits existing as of January 1, 2022, that were removed or decommissioned in 2022, either partially or entirely (as rows). This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns: a) Circuit name b) Circuit ID number c) Circuit miles removed or decommissioned in Non-HFTD Areas d) Circuit miles removed or decommissioned in Other HFTD e) Circuit miles removed or decommissioned in HFTD Tier 2 f) Circuit miles removed or decommissioned in HFTD Tier 3 g) Reason(s) for removal or decommissioning.	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	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292023.pdf (libertyutilities.com)	1			8	Line removal	8.1.2.9

					For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influenced where you performed work in 2022. a) Vegetation management (VM) b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2022. Work performed in 2022 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring		N/A
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	5	CalAdv-03-3.5	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influenced how work in 2022 was sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2022. Work performed in 2022 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring		N/A
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	6	CalAdv-03-3.6	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influence where you plan to perform work in 2023. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring		N/A
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	7	CalAdv-03-3.7	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influence where you plan to perform work in 2023. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring		N/A
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	8	CalAdv-03-3.8	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influence how work in 2023 will be sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring		N/A
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	9	CalAdv-03-3.9	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influence where you plan to perform work in 2024. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring		N/A
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	10	CalAdv-03-3.10	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influence how work in 2024 will be sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring		N/A
CalAdvocates	4	CalAdvocates-Liberty-2023WMP-04	1	CalAdv-04-4.1	For each WMP initiative for which you forecast capital expenditures in 2023 to be at least two times actual capital expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 1.	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty Response_03312023.pdf (libertyutilities.com)	1	WMP Financials	N/A	N/A
CalAdvocates	4	CalAdvocates-Liberty-2023WMP-04	2	CalAdv-04-4.2	For each WMP initiative for which you forecast capital expenditures in 2024 to be at least two times actual capital expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 2.	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty Response_03312023.pdf (libertyutilities.com)	1	WMP Financials	N/A	N/A
CalAdvocates	4	CalAdvocates-Liberty-2023WMP-04	3	CalAdv-04-4.3	For each WMP initiative for which you forecast operating expenditures in 2023 to be at least two times actual operating expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 3.	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty Response_03312023.pdf (libertyutilities.com)	1	WMP Financials	N/A	N/A
CalAdvocates	4	CalAdvocates-Liberty-2023WMP-04	4	CalAdv-04-4.4	For each WMP initiative for which you forecast operating expenditures in 2024 to be at least two times actual operating expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 4.	Aaron Louie	2/24/2023	3/24/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-04_Liberty Response_04102023.pdf (libertyutilities.com)	1	WMP Financials	N/A	N/A
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	1	CalAdv-05-5.1	a) As of January 1, 2022, have you identified transportation corridors within your service territory where falling or falling lines or poles could currently limit egress and/or ingress during an emergency? b) If the answer to part (a) is yes, please describe how you identify such transportation corridors. c) If available, please provide a geospatial data file that contains all current identified transportation corridors with ingress and egress hazards.	a) No. b) N/A c) N/A	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	6	N/A	N/A	N/A
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	2	CalAdv-05-5.2	Provide an Excel table of all distribution circuit-segments that traverse HFTD areas (i.e., the segment has greater than zero circuit-miles in HFTD) existing as of January 1, 2023. The Excel table should list each such circuit-segment as a row and include the following information in separate columns. For items (n) and (o), please include all relevant risk scores. For example, include vegetation risk score, conductor risk score, and any other driver-specific risk scores you have developed. Please insert additional columns as needed to accommodate this. a) Name or ID number of each circuit segment b) Circuit name for the circuit that each segment is part of c) Circuit ID for the circuit that each segment is part of d) Nominal voltage e) Total circuit-miles on the circuit-segment f) Overhead circuit-miles on the circuit-segment in non-HFTD Areas g) Overhead circuit-miles on the circuit-segment in HFTD Tier 2 h) Overhead circuit-miles on the circuit-segment in HFTD Tier 3 i) Underground circuit-miles on the circuit-segment in non-HFTD Areas j) Underground circuit-miles on the circuit-segment in HFTD Tier 2 k) Underground circuit-miles on the circuit-segment in HFTD Tier 3 l) Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing m) Consequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing n) Total wildfire risk score(s) for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Insert additional columns if needed o) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you used for your 2022 WMP filing p) Probability of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing q) Consequence of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 2,"	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	6	N/A	N/A	N/A
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., the model you are using for your 2023-2025 WMP filing) at the circuit-segment level. This data should be equivalent to the previous question, but in GIS format. Please provide, as line features, the most recent spatial data for all circuit segments for which your current risk model calculates circuit-segment-level expected risk (i.e., probability of ignition multiplied by the consequence of ignition). Include the following attributes for each circuit segment: a) Items (a) through (q) of the previous question b) Items (g) through (o) of the previous question	Liberty does not have a geodatabase file containing the outputs from its wildfire risk model used for the 2023-2025 WMP pre-submission at the circuit-segment level.	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	6	N/A	N/A	N/A
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	4	CalAdv-05-5.4	Please fill out the attached spreadsheet, CalAdvocates-Liberty-2023WMP-05_Attachment Tab 1, requesting information regarding your asset inspections in 2022. In response to Data Request CalAdvocates-Liberty-2022WMP-06, Question 7, March 24, 2022, Liberty stated, "Liberty's QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 2022 after Quarter 1 and Quarter 2 detailed inspections are completed." a) Did Liberty implement its QA/QC processes for asset inspections in the second half of 2022 as referenced in the quote above? b) Please summarize the results of Liberty's asset inspection QA/QC reviews in 2022. c) Did Liberty's asset inspection QA/QC reviews in 2022 lead to any corrective actions or improvements, such as performing re-inspections of certain assets, revising inspection protocols, or changing training for inspectors? d) If the answer to part (c) is yes, please describe the actions that Liberty is taking as a result of its asset inspection QA/QC reviews. e) If the answer to part (c) is no, please explain why not.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 4," a) Yes b) As part of its QA/QC process for 2022, Liberty assigned a third-party contractor to re-inspect 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-2023WMP-05_Liberty Response Question 5 and 6." c) No. The QA/QC reviews showed that there are some inconsistencies among inspectors, but the significant issues were captured by both inspections. d) None. e) Minor inconsistencies among inspections are to be expected. Since major issues were captured with both inspections, no action is being taken at this time.	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	1	8	Grid Design, operations, and maintenance (8.1)	8.1.6
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	5	CalAdv-05-5.5	In response to Data Request CalAdvocates-Liberty-2022WMP-06, Question 7, March 24, 2022, Liberty stated "Liberty's QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 2022 after Quarter 1 and Quarter 2 detailed inspections are completed." The following questions refer to the QA/QC processes for asset inspections that Liberty implemented in Quarter 3 and Quarter 4 of 2022: a) Please provide a sample of 5 completed "Appendix A - Program Manager Quarterly Review Acknowledgment" forms. b) Please provide a sample of 5 completed "Appendix B - Senior Manager Annual Review Acknowledgment" forms. c) Please provide a sample of 5 completed "Appendix C - Third Party Inspection" forms that were completed by third party contractors.	a) Liberty completed one Program Manager Review Acknowledgment form for 2022 asset inspection QA/QC activities. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 6." b) Liberty completed one Senior Manager Annual Review Acknowledgment form for 2022 asset inspection QA/QC activities. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 6." c) Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 5 and 6." This file captures the information from the third party QA/QC inspections completed in 2022.	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	1	8	Grid Design, operations, and maintenance (8.1)	8.1.6
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	6	CalAdv-05-5.6			Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.6	

CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	2	CalAdv-10-102	<p>On page 174 of its WMP, Liberty states that it completed Quality Assurance and Quality Control (QA/QC) on 0.004% 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:</p> <p>a) How many individual asset inspections did Liberty conduct QA/QC on in 2022?</p> <p>b) Are both transmission and distribution line inspections included in the 0.004% figure?</p> <p>c) If the answer 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 with a 0.5% sample of detailed inspections that were re-inspected by third-party inspectors. Minimal differences were noted by the third-party inspectors, who found only very minor infractions during the re-inspections if differences were noted at all.</p> <p>d) Please explain the apparent discrepancy between the targets stated on pages 174 and 182 for QA/QC of detailed asset inspections (0.005% on page 174 and 0.5% on page 182).</p> <p>On page 181 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. 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.</p> <p>Please respond to the following:</p> <p>a) How many third-party QA/QC checks were completed on detailed asset inspections in 2022?</p> <p>b) Please explain the apparent discrepancy between the targets stated on pages 174 and 182 for QA/QC of detailed asset inspections (0.005% on page 174 and 0.5% on page 182).</p> <p>On page 181 of its WMP, Liberty states: "As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and internal crews are working to expedite the process. 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."</p> <p>Please respond to the following:</p> <p>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.</p> <p>b) Describe Liberty's current staffing resources allocated to each of the following items under asset management, including but not limited to:</p> <ul style="list-style-type: none"> • Inspections • Maintenance • Resolution of open work orders and any other items not listed above. <p>c) Please evaluate how Liberty's current staffing is sufficient or insufficient to comply with 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 decision framework for Liberty."</p> <p>a) Are the "new vendors" that Liberty refers to above IBM and Direyon?</p> <p>b) If the answer to part (a), above is "no," please provide the name of the vendors and a description of how Liberty utilizes their services in its formal risk model decision Pages 109-110 discuss Liberty's risk evaluation process and how Liberty utilizes Figure 7-1: Risk Identification and Analysis for WMP. With this context:</p> <p>a) What is the total number of "discussion points" that Liberty will plot on Figure 7-1 while conducting its risk evaluation process?</p> <p>b) Please list all of the "discussion points" that Liberty will plot on Figure 7-1 as part of the risk identification and analysis.</p> <p>Pages 116-117 of Liberty's WMP identify the Topaz circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context:</p> <p>a) Does Liberty have any system hardening mitigation work planned in 2023 for the Topaz circuit listed above? If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit.</p> <p>Pages 117-118 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 and used older studies to support this WMP. With this context:</p> <p>a) Does Liberty have any system hardening mitigation work planned in 2023 for the Muller circuit listed above?</p> <p>b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit listed above?</p> <p>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 and used older studies to support this WMP. With this context:</p> <p>a) Does Liberty have any system hardening mitigation work planned in 2023 for the Meyers circuit listed above?</p> <p>b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit listed above?</p> <p>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." When does Liberty anticipate it will have expanded its interim mitigation strategy to incorporate asset management measures, as referenced in the quote?</p> <p>Page 128 of Liberty's WMP states: "Liberty is actively planning and executing wildfire mitigation initiatives while developing its risk based decision-making process."</p> <p>a) Are any WMP activities or initiatives that Liberty is executing in 2023 based upon the abovementioned risk based decision-making process?</p> <p>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.</p> <p>Page 135 of Liberty's WMP states:</p> <p>"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 platform. IBM's Maximo asset health and predict solution that was customized for Liberty will integrate asset risk and detailed vegetation risk data to help asset and vegetation managers better assess operational risk to plan and adjust work activities for significant weather event."</p> <p>Page 138 of Liberty's WMP states:</p> <p>"Liberty's risk-informed decision-making framework is under development. Liberty's engineering, planning, and regulatory staff will need three to six months post-product/service delivery of all risk analyses to fully engage with internal subject matter experts to evaluate the results of the risk analyses."</p> <p>a) When (i.e., month and year) does Liberty expect the development (referenced in the quote above) of the risk-informed decision-making framework to be complete?</p> <p>b) Provide a breakdown of the actual spend including at least the following categories:</p> <ul style="list-style-type: none"> • Risk assessment and modeling • Grid design and system hardening • Asset management and inspections • Vegetation management and inspections <p>On p. 20 of its WMP, Liberty describes its planned spend for the 2023-2025 WMP cycle. Please provide a breakdown of the described proposed expenditures including at least the following categories:</p> <ul style="list-style-type: none"> • Risk assessment and modeling • Grid design and system hardening • Asset management and inspections <p>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 - UDM" is blank.</p> <p>On p. 209 of its WMP, Liberty provides Figure 8-4: "Liberty VM Inspection Overview."</p> <p>a) Please describe what steps Liberty takes if a customer refuses access to his or her property for either a vegetation inspection or a vegetation maintenance activity.</p> <p>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.</p> <p>On p. 243 of its WMP, Liberty provides Table 8-31: "Past Due Vegetation Management Work Orders Categorized by Age."</p> <p>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?</p> <p>b) Please explain why there are 2,588 past due work orders in HTD Tier 2 Areas with ages of 184 days.</p> <p>Please provide copies of the following documents:</p> <ul style="list-style-type: none"> • Corporate Emergency Management Plan (CEMP), dated April 27, 2022, referenced on p. 284 of your WMP • Liberty Utilities Public Safety Power Shutoff Playbook, dated June 13, 2022, referenced on p. 284 of your WMP <p>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 included in the Liberty CEMP."</p> <p>a) Is NV Energy the sole provider of electricity to Liberty's circuit?</p> <p>b) If the answer to part (a) is no, please list the circuits that NV Energy provides electricity to.</p> <p>c) Please describe Liberty's plan in the event of de-energization of its circuits by NV Energy.</p> <p>On p. 162 of its WMP, Liberty states: "These programs, in particular Liberty's SRP program, may reduce the need for PSPS in certain areas."</p> <p>a) Please explain how Liberty's SRP program may reduce the need for PSPS in certain areas.</p> <p>b) Please describe the decision-making process for a situation in which Liberty anticipates PSPS conditions but decides to use its SRP program instead.</p> <p>c) Please list all dates in 2022 when Liberty anticipated PSPS conditions but used its SRP program. Please provide a description of the weather conditions in which Liberty enables its SRP program.</p> <p>d) Please identify the months or seasons in which Liberty enables its SRP program.</p> <p>e) Please provide relevant work documents or procedures that Liberty uses related to enabling its SRP program.</p> <p>On p. 162 of its WMP, Liberty states "Liberty will be expanding the 2022 Fast Trip, or SRP, pilot project because of its effectiveness."</p> <p>a) In Liberty's response to CalAdvocates-Liberty-2023WMP-03, Question 1, the excel sheet column "Q" to "Total customer-minutes of de-energization on the circuit during fast-trip settings 2021" provides a value of 20244 for the Circuit Meyers 3300. Please explain if the pilot SRP program was used in 2021 if Liberty used a different SRP settings because the Liberty's response to question 8 of data request CalAdvocates-Liberty-2023WMP-11 discusses the "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."</p> <p>a) Please explain why Liberty has decided to not move forward with the proposed solution from IBM to consolidate its risk data sources.</p> <p>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.</p> <p>a) How many reportable distribution ignitions did Liberty experience in 2020?</p> <p>b) How many reportable distribution ignitions did Liberty experience in 2021?</p> <p>c) How many reportable distribution ignitions did Liberty experience in 2022?</p> <p>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:</p> <ul style="list-style-type: none"> a) Date b) Circuit ID number c) Line Type (Distribution or Transmission) 	a) 24 b) Yes c) N/A d) 15 transmission (60 KV) and 9 distribution.	Talal Harahsheh	5/26/2023	6/1/2023	6/2/2023	CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.3
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	3	CalAdv-10-103	<p>a) 24 b) Six re-inspections noted minor differences. c) Examples include noting level 3 differences such as foreign spig, loose secondary down guy, and auto splice '1' away from insulator.</p>	Talal Harahsheh	5/26/2023	6/1/2023	6/2/2023	CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.6	
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	4	CalAdv-10-104	<p>a) Liberty halted its detailed inspections on January 1st, 2023, with the exception of detailed underground inspections due in 2023. b) 40.3 circuit miles. c) Liberty has not completed detailed inspections yet in 2023. d) Liberty is currently planning to resume its detailed inspections on January 1st, 2024. e) Liberty is halting its detailed overhead inspections in 2023 in order to avoid further overlap of infractions found in its 2020 full system survey and prioritize repairs to infractions found during the system survey. f) 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 an overhead detailed inspection.</p>	Talal Harahsheh	5/26/2023	6/1/2023	6/2/2023	CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.6	
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	5	CalAdv-10-105	<p>a) Liberty's current staffing resources include: i. Inspections: Five internal inspectors and one contract inspector ii. Maintenance: Four internal crews and three contract crews available 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.</p>	Talal Harahsheh	5/26/2023	6/1/2023	6/2/2023	CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.7	
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	6	CalAdv-10-106	<p>a) Inspections: Five internal inspectors and one contract inspector b. Maintenance: Four internal crews and three contract crews available 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.</p>	Talal Harahsheh	5/26/2023	6/1/2023	6/2/2023	CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.7	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	1	CalAdv-11-111	<p>a) Liberty does not know the total number of discussion points that will be included in its risk evaluation process as Liberty advances its risk model decision framework.</p> <p>b) Examples of discussion points included in the risk evaluation process are: • Identification of all risk events; • Likelihood of wildfire risk drivers; • Impacts of significant weather (snow and wind) on asset degradation and health.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.1.1	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	2	CalAdv-11-112	<p>a) Yes. b) Liberty is completing traditional overhead hardening on three projects in 2023. Those projects are Cunningham Lane, Eastside Lane, Larsen Lane. Liberty is also replacing or repairing various poles on this circuit to address needs found during system surveys.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.1.1	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	3	CalAdv-11-113	<p>a) Yes. b) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys. c) N/A c) Yes. d) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys. Liberty is also planning to do some system hardening on this circuit.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.1.3	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	4	CalAdv-11-114	<p>a) Yes. 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 (0.39 miles). Liberty will also complete 0.11 miles of undergrounding on the Cascade Project. Liberty is also replacing or repairing various poles on these circuits to address needs found during system surveys.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.1.3	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	5	CalAdv-11-115	<p>a) N/A b) During the 2023-2025 WMP cycle.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.1.3	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	6	CalAdv-11-116	<p>a) No. b) N/A 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.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.1.4	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	7	CalAdv-11-117	<p>a) Examples of evaluation criteria Liberty considered are cost, accuracy of risk 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. c) Liberty has decided to not move forward with IBM's proposed solution at this time.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.1.4	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	8	CalAdv-11-118	<p>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 wildfire risk modeling is an ongoing process that is informed by the results of current risk studies (i.e., Technovis modeling results, Reax modeling results, Direyon outputs), OES risk modeling guidelines, and collaborative discussions with stakeholders throughout the 2023-2025 WMP cycle.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.2.2	
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	9	CalAdv-11-119	<p>a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OES on March 8, 2023. b) See response 1a. c) See response 2b.</p>	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty-Response-to-DR-CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.2.3	
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	1	CalAdv-12-121	<p>a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OES on March 8, 2023. b) See response 2a. c) See response 2b.</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty_Response_06092023.pdf (libertyutilities.com)	4	Proposed Expenditures (4.3)		
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	2	CalAdv-12-122	<p>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 - UDM" and the initiative activity row was inadvertently split up due to the page break.</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty_Response_06092023.pdf (libertyutilities.com)	4	Proposed Expenditures (4.3)		
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	3	CalAdv-12-123	<p>a) If Liberty VM field personnel are unable to perform their job function due to a customer refusing access, the refusal shall be documented in the VM system and on the Refusal Form document. If possible, the vegetation condition and vicinity to facilities 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 escalation. Extra effort should be made by 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 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 complete work orders and mitigate identified tree conditions within the timelines specified in its VM-05 based on the assigned level of assigned to the vegetation work order. a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty_Response_06092023.pdf (libertyutilities.com)	8	Vegetation Management and Inspections (8.2)	8.2.1.2	
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	4	CalAdv-12-124	<p>a) Liberty VM field personnel are unable to perform their job function due to a customer refusing access, the refusal shall be documented in the VM system and on the Refusal Form document. If possible, the vegetation condition and vicinity to facilities 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 escalation. Extra effort should be made by 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 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 complete work orders and mitigate identified tree conditions within the timelines specified in its VM-05 based on the assigned level of assigned to the vegetation work order. a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty_Response_06092023.pdf (libertyutilities.com)	8	Vegetation Management and Inspections (8.2)	8.2.2	
CalAdvocates	12	CalAdvocates-Liberty-2023WMP-12	5	CalAdv-12-125	<p>a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty_Response_06092023.pdf (libertyutilities.com)	8	Vegetation Management and Inspections (8.2)	8.2.6	
CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	1	CalAdv-13-131	<p>a) Yes. 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. d) Liberty objects to this request as vague and ambiguous with regard to the term "de-energization," overhead, and/or burdensome, and not responsible compared to lead in.</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-13_Liberty_Response_06092023.pdf (libertyutilities.com)	8	Emergency Preparedness (8.4)	8.4.2	
CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	2	CalAdv-13-132	<p>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 settings that Liberty is currently planning to use for the SRP system are not currently known to be low enough to make this call. Liberty will evaluate this topic with UNR.</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-13_Liberty_Response_06092023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.2.6	
CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	3	CalAdv-13-133	<p>a) Various weather conditions influence the SRP decision process, including wind conditions, temperature conditions, and moisture content. b) The area of Liberty service territory and weather conditions in any given year or month 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 are high.</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-13_Liberty_Response_06092023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.2.6	
CalAdvocates	13	CalAdvocates-Liberty-2023WMP-13	4	CalAdv-13-134	<p>a) Liberty utilized a different program in 2021. Prior to the SRP program pilot in 2022, Liberty utilized "wildfire mode" settings which removes re-energizing. The SRP program takes this a step further by removing re-energizing and lowering the trip settings to a number that impacts relay coordination and reduces incident energy on fault conditions, which in turn reduces ignition risk. b) In 2022, Liberty utilized a mix of SRP settings and "wildfire mode" settings because the a) In its evaluation of whether to move forward with the proposed solution from IBM, Liberty considered factors including: • cost; • system compatibility, particularly the risk of moving forward with the solution prior to SAP implementation later this year; and • the ability to operationalize model outputs.</p>	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-13_Liberty_Response_06092023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1)	8.1.2.6	
CalAdvocates	14	CalAdvocates-Liberty-2023WMP-14	1	CalAdv-14-141	<p>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.</p>	Talal Harahsheh	6/8/2023	6/13/2023	6/13/2023	CalAdvocates-Liberty-2023WMP-14_Liberty_Response_06132023.pdf (libertyutilities.com)				
CalAdvocates	15	CalAdvocates-Liberty-2023WMP-15	1	CalAdv-15-151	<p>a) One. b) Three. c) One.</p>	Talal Harahsheh	6/14/2023	6/19/2023	6/20/2023	CalAdvocates-Liberty-2023WMP-15_Liberty_Response_06202023.pdf (libertyutilities.com)				
CalAdvocates	15	CalAdvocates-Liberty-2023WMP-15	2	CalAdv-15-152	<p>Refer to file: CalAdvocates-Liberty-2023WMP-15_Liberty-Response-Question-3.</p>	Talal Harahsheh	6/14/2023	6/19/2023	6/20/2023	CalAdvocates-Liberty-2023WMP-15_Liberty_Response_06202023.pdf (libertyutilities.com)				
CalAdvocates	15	CalAdvocates-Liberty-2023WMP-15	3	CalAdv-15-153	<p>a) Date b) Circuit ID number c) Line Type (Distribution or Transmission)</p>	Talal Harahsheh	6/14/2023	6/19/2023	6/20/2023	CalAdvocates-Liberty-2023WMP-15_Liberty_Response_06202023.pdf (libertyutilities.com)				

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 filing.	Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP pre-submission.	Gregg Morris	3/6/2023	3/9/2023	3/8/2023	GPI_Liberty_2023WMP_01_Liberty_Response_03082023.pdf (libertyutilities.com)	1		WMP Pre-Submission	Administrative	N/A
OEIS	1	OEIS-P-WMP_2023-LU-001	1	OEIS-1-1.1	Q01. Regarding Weather Station Standards and Locations: a. Liberty states in section 8.3.2.1 of its WMP (p. 243): "...weather station network currently consists of 35 stations that are distributed throughout the service territory and plans to add an additional four stations in 2023. In addition to Liberty's weather stations, there are dozens more BAWs and NWS weather stations within the service territory that are monitored through the MesWest network." i. Provide the installation and equipment standard that all Liberty weather stations are installed to, including height from ground, direction of cross-arm, and which side of the pole/tower they are installed on.	Response to Q01: i. Standards including the height from ground and side of pole for installation are based on existing equipment that occupy the pole as well as bucket truck accessibility. Additional installation guidelines are provided in supporting materials: "Attachment Q01_LibertyWeather Station Installation Guide." ii. None. iii. 2020: 10, 2021: 29, 2022: 29. iv. Refer to supporting materials: "Attachment Q01.iv_LIB-Parts-Lifespan-Warranty." v. None.	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)	4			Situational Awareness & Forecasting (8.3)	8.3.2
OEIS	1	OEIS-P-WMP_2023-LU-001	2	OEIS-1-1.2	Q02. Regarding Fuel Moisture Sampling: a. Liberty states in section 8.3.2.1 of its WMP (p. 243): "In 2022, fuel moisture sampling was conducted on a weekly basis and will continue during the 2023 fire season." i. Provide a map of the Live Fuel Moisture (LFM) and Dead Fuel Moisture (DFM) sampling sites, including any sites used that are being collected by other entities (CAL FIRE, ISES, BLM, etc.).	Response to Q02: i. Refer to: https://fuelmoisture.com ii. Vegetation types: • Sagebrush at Meyers and Topaz (CA) • Amaranth at West Creek and Huron Creek (CA)	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)				Situational Awareness & Forecasting (8.3)	8.3.2
OEIS	1	OEIS-P-WMP_2023-LU-001	3	OEIS-1-1.3	Q03. Regarding Explosion Fuse Replacements: a. On page 167 of Liberty's 2023 WMP, Liberty states: "At the end of 2022, Liberty became aware that one of the current-limiting fuse options on the market was experiencing failures in the field. Liberty halted explosion fuse replacements because these current-limiting fuses failed to provide ignition risk reduction." i. Provide the number of failures Liberty experienced with this current-limiting fuse. ii. Provide the number of ignitions associated with this current-limiting fuse that Liberty has experienced, broken down by year, if applicable. b. On page 167 of Liberty's 2023 WMP, Liberty states: "The current-limiting fuse vendor suggested that no more fuses should be installed, and any that were installed needed to be continuously checked to confirm they did not have any air gaps that would create a spark or cause a fire." Q04. Regarding QA/QC for Asset Inspections: a. On page 182 of Liberty's 2023 WMP, Liberty states: "Current pass rates and pass rate targets are not currently available. Pass rates and targets will be established and implemented for use during its 2023 QA/QC of inspections." i. Has Liberty established these pass rates? If so, provide pass rates broken down by inspection type as applicable. If not, provide Liberty's expected timeline for establishment, and describe type as applicable.	Response to Q03: i. Liberty experienced four documented failures. ii. Liberty has experienced no ignitions associated with these fuses. b. i. The language quoted in this question was incorrectly stated in Liberty's 2023 WMP. The words "continuously checked" were an error and should have been "continuity-checked". ii. Liberty plans to replace the fuses with ELF non-explosion fuses. iii. 2018 2019 2020 2021 2022 2023	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)				Grid Design, operations, and maintenance (8.1)	8.1.2
OEIS	1	OEIS-P-WMP_2023-LU-001	4	OEIS-1-1.4	Q05. Regarding Open Work Orders: a. In Table 8-11 of Liberty's 2023 WMP, Liberty shows a total of 390 overdue work orders in HFD Tier 2 or 3, with 285 work orders 181+ days overdue. i. Provide details as to why these work orders are overdue, including trends on cause for delay.	Response to Q04: i. No. Liberty expects it to take two years of program implementation and data collection to determine the appropriate metrics and scoring criteria to measure QA/QC program performance, including establishing an Acceptable Quality Level ("AQL") and Performance Rate ("CR").	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)				Grid Design, operations, and maintenance (8.1)	8.1.3
OEIS	1	OEIS-P-WMP_2023-LU-001	5	OEIS-1-1.5	Q06. Regarding Fast Trip Settings: a. On page 185 of Liberty's 2023 WMP, Liberty states "the use of fast trip settings will have an impact on system reliability." What, if any, reliability impacts has Liberty observed from use of fast trip settings so far? This should include data on the following: i. Number of outages that occurred while fast trip settings were enabled. ii. Number of customers affected by such outages. iii. Duration of outages that occurred while fast trip settings were enabled.	Response to Q05: i. The main cause includes limited resources being diverted to respond to storm events instead of being directed toward GO 95 infractions. Liberty plans to continue to address its outstanding Level 2 repairs in 2023 and plans to bring on additional contract resources in Q3 and Q4 of 2023 in order to stay in compliance with GO timelines.	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)				Grid Design, operations, and maintenance (8.1)	8.1.2
OEIS	1	OEIS-P-WMP_2023-LU-001	6	OEIS-1-1.6	Q07. AlertWildfire Camera Sponsorship: a. In Liberty's 2023 WMP (pp. 265-266), Liberty states it intends to sponsor and support eight HD Cameras within its territory in 2023. Liberty stated it is finalizing the partnership for the eight cameras prior to the fire season in both its 2021 (p. 83) and 2022 (p. 107) WMP submissions. i. Provide an overview of the process involved in adopting/partnering/sponsoring of these eight cameras. ii. Provide an explanation behind the delays in achieving the previous targeted goals for partnering/adopting/sponsoring of the eight HD Cameras, including specific challenges or obstacles that has led to the postponement.	Response to Q06: a. Refer to supporting materials: "Attachment Q06.a. and Q06.f. Liberty Fast Trip Data." b. Liberty is planning to implement sensitive relay profile (SRP) settings that are designed to not cause nuisance trips but will trip as needed to provide protection. Settings will be staged to minimize portions of circuits that will be de-energized. In addition, Liberty will be adding fault indicators on circuits with SRP settings in order to aid in quickly locating faults and restoring power.	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)	1			Grid Design, operations, and maintenance (8.1)	8.1.8
OEIS	1	OEIS-P-WMP_2023-LU-001	7	OEIS-1-1.7	Q07. AlertWildfire Camera Sponsorship: a. In Liberty's 2023 WMP (pp. 265-266), Liberty states it intends to sponsor and support eight HD Cameras within its territory in 2023. Liberty stated it is finalizing the partnership for the eight cameras prior to the fire season in both its 2021 (p. 83) and 2022 (p. 107) WMP submissions. i. Provide an overview of the process involved in adopting/partnering/sponsoring of these eight cameras. ii. Provide an explanation behind the delays in achieving the previous targeted goals for partnering/adopting/sponsoring of the eight HD Cameras, including specific challenges or obstacles that has led to the postponement.	Response to Q07: i. Liberty has partnered with the University of Nevada, Reno and the AlertWildfire camera network to bring eight cameras in the Lake Tahoe Basin as well as the ability to access other existing cameras within Liberty's service territory. The process has included discussions with AlertWildfire regarding the AlertWildfire annual operations services, scope of work, pricing and locations. The process has also included negotiating a service agreement for the targeted AlertWildfire cameras. ii. Liberty has experienced challenges finalizing terms in the service agreement for the	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)				Grid Design, operations, and maintenance (8.1)	8.3.4.3