| Party Name DR Set # | Data Request | Question No. | Question ID | | Responses | Requestor | Date Received | Final Date Due Date Sent | Links | Number of Attachements Attachment Links NDA Req | uired? WMP Section | n Category | Su |
|---------------------|---------------------------------|--------------|---------------|---|--|-------------|---------------|--------------------------|---|---|------------------------|--|-------------|
| | | | | 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 | | | |
| | | | | 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 | | | | | | | | | |
| Advocates 1 (| CalAdvocates-Liberty-2023WMP-01 | 1 | CalAdv-01-1.1 | context concerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP). | | Aaron Louie | 2/24/2023 | 3/8/2023 | CalAdvocates-Liberty-2023WMP-01_Liberty_ Response_03082023.pdf (libertyutilities.com) | | WMP Pre- Submission | Administrative | N, |
| Advocates 1 (| CalAdvocates-Liberty-2023WMP-01 | 2 | CalAdv-01-1.2 | Please provide a copy of your WMP pre-submission within two business days of its submission to Energy Safety. Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports | 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, |
| | | | | | February 1, 2023. However, due to technical issues with the CPUC Kiteworks platform, | | | N/A | CalAdvocates-Liberty-2023WMP-01_Liberty_ | | WMP Pre- | | |
| Advocates 1 (| CalAdvocates-Liberty-2023WMP-01 | 3 | CalAdv-01-1.3 | sent to Energy Safety. 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: | 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 | | 3 <u>Response_03082023.pdf (libertyutilities.com)</u> | | Submission | Administrative | N |
| Advocates 1 | CalAdvocates-Liberty-2023WMP-01 | 4 | CalAdv-01-1.4 | a) Confidential responses to WMP discovery requests issued by Energy Safety. b) Confidential responses to WMP discovery requests issued by other entities. | requests made by Energy safety and other entities. | Aaron Louie | 2/24/2023 | N/A 3/8/2023 | CalAdvocates-Liberty-2023WMP-01_Liberty_ 3 Response_03082023.pdf (libertyutilities.com) | | WMP Pre- Submission | Administrative | Ν |
| | | | | 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 | 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 | , , | | | | | | | |
| Advocates 2 d | CalAdvocates-Liberty-2023WMP-02 | 1 | CalAdv-02-2.1 | | to CalAdvocates by March 17, 2023. | Aaron Louie | 2/24/2023 | 3/10/2023 3/10/2023 | CalAdvocates-Liberty-2023WMP-02_Liberty_ 3 Response_03102023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance (8.1 Vegetation Management (8.2) | 8.1). 8. |
| | | | | any programs, initiatives, or strategies described in your 2022 WMP Update. External entities include, but are not limited to, consultants, contractors, auditors, court-appointed monitors, and Independent Evaluators. | Refer to the following vegetation management files and folders in the Supporting Materials email for this data request response sent to CalAdvocates through the CPUC Kiteworks system: • 2022_VM_QC_Pass_Results_Report.xlsx • TAH7300_LiDAR_Work_QC_Corrective_Action.xlsx • QC of Completed Work folder • QC of Inspections folder Liberty is in the process of collecting QA/QC materials completed as part of its asset inspections QA/QC program in 2022. Liberty plans to provide this information to CalAdvocates by March 17, 2023. • QC of Pole Clearing folder | | | | <u>CalAdvocates-Liberty-2023WMP-02_Liberty_</u> | 6 | | Grid Design, operations, and maintenance (8.1 | 5.1). |
| Advocates 2 d | CalAdvocates-Liberty-2023WMP-02 | 2 | CalAdv-02-2.2 | Provide an Excel table of all defects in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns. a) Associated | Dead tree audit 7_22 folder Liberty did not receive any Notices of Defects from Energy Safety in 2022. | Aaron Louie | 2/24/2023 | 3/10/2023 3/10/2023 | 3 Response_03102023.pdf (libertyutilities.com) | | 8 | Vegetation Management (8.2) | 8 |
| Advocates 2 (| CalAdvocates-Liberty-2023WMP-02 | 3 | CalAdv-02-2.3 | circuit name b) Defect type c) Description of defect d) 2022 WMP initiative (from your 2022 WMP update) associated with defect e) Date that the defect was identified f) Date that the defect was corrected g) If the defect has not yet been corrected as of the issuance date of this data request, a brief explanation. h) Priority level of corresponding corrective tag i) Geographic latitude of defect in decimal degrees, truncated to seven decimal places j) Geographic longitude of defect in decimal degrees, truncated to seven decimal places. Provide an Excel table of all violations in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns. a) Associated circuit name b) Violation type c) Description of violation d) 2022 WMP initiative (from your 2022 WMP update) associated with violation e) Date that the violation was identified f) Date that the violation was corrected g) If the violation has not yet been corrected as of the issuance date of this data request, a brief | 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 | 1 |
| dvocates 2 (| CalAdvocates-Liberty-2023WMP-02 | 4 | CalAdv-02-2.4 | 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. | Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Questions 1-4," Tab Q1 – Distribution. | Aaron Louie | 2/24/2023 | 3/10/2023 3/10/2023 | <u>CalAdvocates-Liberty-2023WMP-02_Liberty</u> 3 <u>Response_03102023.pdf (libertyutilities.com)</u> | | 12 | Notices of Violation and Defect | |
| Advocates 3 0 | CalAdvocates-Liberty-2023WMP-03 | 1 | CalAdv-03-3.1 | | | Aaron Louie | 2/24/2023 | 3/24/2023 3/29/2023 | CalAdvocates-Liberty-2023WMP-03_Liberty_ Response_03292023.pdf (libertyutilities.com) | | 5, 6 | Electrical Infrastructure | 5 |
| | | | | 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 | Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Questions 1-4," Tab Q2 – Transmission. | 5 | | | | | | | |
| | | | | 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) Total customer-minutes of de-energization on the circuit due to PSPS events in 2021 (sum of customer-minutes across all PSPS events). j) Total customer-minutes of de-energization on the circuit due to PSPS events in 2022 (sum of customer-minutes across all PSPS 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 2022 n) Number of support structures replaced in Other HFTD in 2022 n) Number of support structures replaced in HFTD Tier 2 in 2021 n) Number of support structures replaced in HFTD Tier 2 in 2021 n) Number of support structures replaced in HFTD Tier 3 in 2022 u) Miles of LiDAR inspection in Non-HFTD in 2022 w) Miles of LiDAR inspection in Other HFTD in 2022 x) Miles of LiDAR inspection in Other HFTD in 2022 | | | | | CalAdvocates-Liberty-2023WMP-03 Liberty | | | | |
| alAdvocates 3 (| CalAdvocates-Liberty-2023WMP-03 | 2 | CalAdv-03-3.2 | Provide an Excel table of all distribution circuits existing as of January 1, 2022, that were removed or decommissioned in 2022, either partially or entirely (as rows). This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns. a) Circuit name b) Circuit ID number c) Circuit miles removed or decommissioned in Non-HFTD Areas d) Circuit miles removed or decommissioned in Other HFTD e) Circuit miles removed or decommissioned in HFTD Tier 2 | Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_ Liberty Response Questions 1-4," Tab Q3 – Distribution Removals. | Aaron Louie | 2/24/2023 | 3/24/2023 3/29/2023 | 3 <u>Response_03292023.pdf (libertyutilities.com)</u> | 1 | 5, 6 | Electrical Infrastructure | 5.2 |
| Advocates 30 | CalAdvocates-Liberty-2023WMP-03 | 3 | CalAdv-03-3.3 | f) 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. 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 | 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_ 3 Response_03292023.pdf (libertyutilities.com) | | 8 | Line Removal | 8 |
| Advocates 3 | | | | 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 | | | | | | 1 | | | |
| Advocates 3 | | | | lines that were decommissioned but not physically removed. Include the following information in separate columns. a) Circuit name b) Circuit ID number | | | | | | 1 | | | |

| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 5 | CalAdv-05-5.5 | Implement its QA/QC processes for asset inspections in the second half of 2022 as referenced in the quote above?snow, equating to 0.44% re-inspected. Refer to supporting file: "CalAdvocates-Liberty- 2023WMP-05_Liberty Response Question 5 and 6."c)(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?(c) No. The QA/QC reviews showed that there are some inconsistencies among inspections.(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 processes for asset inspections are developed for implementation in 2022. The QA/QC processes of asset inspections were developed for implementation in 2022. 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 Quarter 4 of 2022. a) Please provide a sample of 5 completed "Appendix A – Program Manager Quarter 4 of 2022. a) Please provide a sample of 5 completed "Appendix A – Program Manager Quarter 4 of 2022. a) Please provide a sample of 5 completed "Appendix A – Program Manager Quarter 4 of 2022. a) Please provide a sample of 5 completed "Appendix A – Program Manager Quarter 4 for supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 6b." (c) Refer to supporting file: "CalAdvocate | 2/24/2023 | 3/30/2023 4/10/2023 CalAdvocates-Liberty-2023WMP-05 Liberty 3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com) | 1 | 8 8 | Grid Design, operations, and maintenance (8.1) 8.1.6 Grid Design, operations, and maintenance (8.1) 8.1.6 |
|------------------------------|--|----|--------------------------------|---|-----------|--|---|---------------|--|
| | | | <u></u> | 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 snow, equating to 0.44% re-inspected. Refer to supporting file: "CalAdvocates-Liberty-Aaron Louie Aaron Louie | | | | | |
| CalAdvocates CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 5 CalAdvocates-Liberty-2023WMP-05 | 34 | CalAdv-05-5.3 CalAdv-05-5.4 | 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 (c) of the previous question b) Items (p) through (s) of the previous question.Aaron LouiePlease fill out the attached spreadsheet, CalAdvocates-Liberty-2023WMP-05_Attachment Tab 1, requesting information regarding your asset inspections in 2022.Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 4." | 2/24/2023 | 3/30/2023 4/10/2023 CalAdvocates-Liberty-2023WMP-05_Liberty_ 3/30/2023 4/10/2023 Response_04102023.pdf (libertyutilities.com) 3/30/2023 4/10/2023 Response_04102023.pdf (libertyutilities.com) | 1 | 6 | N/A N/A Grid Design, operations, and maintenance (8.1) 8.1.6 |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 2 | CalAdv-05-5.2 | k) Underground circuit-miles on the circuit-segment in HFTD Tier 3 i) Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing in Ocnsequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing in Ocnsequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing. in Ocnsequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing. in Ocnsequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing. in Ocnsequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing in Ocnsequence of ignition score for the circuit-segment, according to the risk model you are using for your 2022 WMP filing in Ocnsequence of ignition score for the circuit-segment, according to the risk model you are using for your 2022 WMP filing in Ocnsequence of ignition score for the circuit-segment, according to the risk model you are using for your 2022 WMP filing in Ocnsequence of ignition score for the circuit-segment, according to the risk model you are using for your 2022 WMP filing), at the circuit-segment level. (This data should be equivalent to the previous question, but in GIS format.) Please provide, as line iberty does not have a geodatabase file containing the outputs from its 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 iberty does not have a geodatabase file containing the outputs from its wildfire risk model (i.e., the model you are using f | 2/24/2023 | 3/30/2023 4/10/2023 Response_04102023.pdf (libertyutilities.com) | | 6 | N/A N/A |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | 1 | CalAdv-05-5.1 | transportation corridors. c) If available, please provide a geospatial data file that contains all current identified transportation corridors with ingress and egress hazards. Provide an Excel table of all distribution circuit-segments that traverse HFTD areas (i.e., the segment has greater than zero circuit-miles in HFTD) existing as of January 1, 2023. The Excel table should list each such circuit-segment as a row and include the following information in separate columns. For items (n) and (r), please include all relevant risk scores. For example, include vegetation risk score, conductor risk score, and any other driver-specific risk scores you have developed. Please insert additional columns as needed to accommodate this. a) Name or ID number of each circuit segment b) Circuit name for the circuit that each segment is part of c) Circuit. Tol for the circuit that each segment is part of d) Nominal voltage e) Total 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 j) Underground circuit-miles on the circuit-segment in HFTD Tier 2 | 2/24/2023 | 3/30/2023 CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com) | 1 | 6 | N/A N/A |
| CalAdvocates | 4 CalAdvocates-Liberty-2023WMP-04 | 4 | CalAdv-04-4.4 | c) The name of the initiative as it is identified in your 2022 WMP Update a) 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 e) An explanation for the projected increase. Aaron Louie a) As of January 1, 2022, have you identified transportation corridors within your service a) No. b) N/A c) N/A territory where falling or failing lines or poles could currently limit egress and/or ingress during a) No. b) N/A c) N/A an emergency? b) If the answer to part (a) is yes, please describe how you identify such b) the answer to part (a) is yes, please describe how you identify such | 2/24/2023 | 3/24/2023 4/10/2023 Cold due contex Liberty 2023WMP-04_Liberty Cold due contex Liberty 2023WMP-04_Liberty | | WMP Financial | N/A N/A |
| CalAdvocates | 4 CalAdvocates-Liberty-2023WMP-04 | 3 | CalAdv-04-4.3 | c) The name of the initiative as it is identified in your 2022 WMP Update an explanation for the projected increase. an explanation for the projected increase. aron Louie c) An explanation for the projected increase. Aaron Louie aron Louie 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 Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 4. b) The WMP Initiative number in Table 11 of your 2023-2025 WMP aron your approximation 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 aron your approximation of the initiative as it is identified in your 2023-2025 WMP | 2/24/2023 | 3/24/2023 3/31/2023 CalAdvocates-Liberty-2023WMP-04_Liberty_ Response_03312023.pdf (libertyutilities.com) | 1 | WMP Financial | N/A N/A |
| CalAdvocates | 4 CalAdvocates-Liberty-2023WMP-04 | 2 | CalAdv-04-4.2 | d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase. Aaron Louie 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 Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 3. b) The WMP Initiative number in Table 11 of your 2023-2025 WMP 1-4," Tab Response 3. | 2/24/2023 | 3/24/2023 3/31/2023 CalAdvocates-Liberty-2023WMP-04_Liberty 3/31/2023 Response_03312023.pdf (libertyutilities.com) | 1 | WMP Financial | N/A N/A |
| CalAdvocates | 4 CalAdvocates-Liberty-2023WMP-04 | 1 | CalAdv-04-4.1 | e) An explanation for the projected increase.Aaron LouieFor 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 2023-2025 WMP UpdateRefer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions" 1-4," Tab Response 2.b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP UpdateHere to support the initiative as it is identified in your 2023-2025 WMP Update | 2/24/2023 | 3/24/2023 3/31/2023 Response_03312023.pdf (libertyutilities.com) | 1 | WMP Financial | N/A N/A |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 10 | | j) LiDAR inspections of distribution assets k) LiDAR inspections of transmission assets.Aaron LouieFor 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 b) The name of the initiative as it is identified in your 2023-2025 WMP UpdateRefer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions" 1-4," Tab Response 1.c) The name of the initiative as it is identified in your 2022 WMP UpdateHertified in your 2023-2025 WMP (Dified in your 2022 WMP Updated) The WMP Initiative number in Table 12 of your 2022 WMP UpdateHertified in your 2022 WMP Update | 2/24/2023 | 3/24/2023 3/29/2023 Response_03292023.pdf (libertyutilities.com) 3/24/2023 CalAdvocates-Liberty-2023WMP-04_Liberty_ | 1 | 6 | Risk Scoring N/A |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 9 | CalAdv-03-3.9 | (a) Details inspections of transmission assets (a) Aerial inspections of transmission assets (i) Aerial inspections of transmission assets (a) Aerial inspections of transmission assets (j) LiDAR inspections of transmission. Aaron Louie 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 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 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. (c) Undergrounding (initiative subsections of distribution assets (f) Detailed inspections of distribution assets (initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. (g) Detailed inspections of distribution assets (initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission assets (h) Aerial inspections of transmission assets (initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. | 2/24/2023 | 3/24/2023 3/29/2023 CalAdvocates-Liberty-2023WMP-03_Liberty_ Response_03292023.pdf (libertyutilities.com) | | 6 | Risk Scoring N/A |
| | | | | For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2024. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assetsLiberty 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. | | | | | |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 8 | CalAdv-03-3.8 | For each WMP initiative listed below, please state which and how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2023 will be sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets b) Aerial inspections of transmission assets j) LiDAR inspections of transmission assets k) LiDAR inspections of transmission assets. k) LiDAR inspections distribution assets. k) LiDAR inspections distribution assets. k) LiDAR inspections distribution assets k) LiDAR inspections distribution assets k) LiDAR | 2/24/2023 | 3/24/2023 3/29/2023 Response_03292023.pdf (libertyutilities.com) | | 6 | Risk Scoring N/A |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 3 CalAdvocates-Liberty-2023WMP-03 | 6 | | k) LiDAR inspections of transmission assets.Aaron LouieFor 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) VMLiberty 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 of distribution assets j) LiDAR inspections of distribution assets j) LiDAR inspections of transmission assets.Initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. Aaron LouieAaron Louie | 2/24/2023 | 3/24/2023 3/29/2023 Response_03292023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-03_Liberty 3/24/2023 3/29/2023 Response_03292023.pdf (libertyutilities.com) | | 6 | Risk Scoring N/A |
| CalAdvocates | 3 CalAdvocates-Liberty-2023WMP-03 | 5 | | j) LiDAR inspections of distribution assetsAaron Louiek) LiDAR inspections of transmission assets.Aaron LouieFor 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) VMLiberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2022. Work performed in 2022 was planned 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 of distribution assetsg) Detailed inspections of distribution assetsinitiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.h) Aerial inspections of distribution assetsinitiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.j) LiDAR inspections of distribution assetsinitiative subsections of distribution assetsj) LiDAR inspections of distribution assetsinitiative subsections of distribution assets | 2/24/2023 | 3/24/2023 3/29/2023 Response_03292023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-03_Liberty_ CalAdvocates-Liberty-2023WMP-03_Liberty_ | | 6 | Risk Scoring N/A |
| | | | | For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced where you performed work in 2022. a) Vegetation management (VM)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 of distribution assets g) Detailed inspections of distribution assets b) Aerial inspections of transmission assetsHore 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.h) Aerial inspections of distribution assets i) Aerial inspections of transmission assetsHore and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission. | | | | | |

| CalAdvocates CalAdvocates CalAdvocates CalAdvocates CalAdvocates CalAdvocates CalAdvocates CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 5 CalAdvocates-Liberty-2023WMP-05 | 7 CalAdv-05 | 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 open at the end of the quarter. Add the following information in separate columns: a) Name of the associated circuit Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 7." Image: CalAdvocates-Liberty-2023WMP-05_Liberty Image: CalAdvocates-Liberty-2023WMP-05_L | 8 Grid Design, operations, and maintenance (8.1) 8.1.6 |
|---|--|------------------|--|--|
| CalAdvocates CalAdvocates | | 7 CalAdv-05 | 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 d) Geographic longitude in decimal degrees, truncated to seven decimal places e 0 bject/damage code or other description of defect Aaron Louie 2/24/2023 3/30/2023 4/10/2023 Response 04102023.pdf (liberty-utilities.com) | 8 Grid Design operations and maintenance (9.1) 9.1.6 |
| CalAdvocates CalAdvocates | | 7 CalAdv-05 | c) Geographic latitude in decimal degrees, truncated to seven decimal places d) Geographic longitude in decimal degrees, truncated to seven decimal places 4.7 e) Object/damage code or other description of defect 10 for the description 10 for | 8 Grid Design operations and maintenance (9.1) 9.1.6 |
| CalAdvocates CalAdvocates | | 7 CalAdv-05 | .7e) Object/damage code or other description of defect3/30/20234/10/2023Response_04102023.pdf (libertyutilities.com) | 8 Grid Design operations and maintenance (9.1) 9.1.6 |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | | Regarding Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of Tables in your WMP Quarterly Data Report for Q4 of | |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | | 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? assess the prioritization of corrective actions and replacements. | |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | | 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? | |
| CalAdvocates | 5 CalAdvocates-Liberty-2023WMP-05 | | 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. Additionally, the Job Facilitator's role may include verification of issues identified during | |
| | | 8 CalAdv-05 | 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 | 8 Grid Design, operations, and maintenance (8.1) 8.1.6 |
| | | | safety risk to workers and/or the public. "Safety risk" here is defined as any occurrence on a worksite where the contractor's behavior created a safety hazard for either workers or the public. | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 1 CalAdv-06 | general public. For each instance, please provide: a) The date you were informed of the safety issue was performed of the safety performed of the safety issue was performed of the safety issue was performed of the safety perfo | 8 Vegetation Management and Inspections (8.2) 8.2.7 |
| CalAdvocates | , | | Provide your workplan that describes where and when you will perform system hardening on distribution circuits in 2023. For projects that you expect to partially complete in 2023 (i.e., Response Questions 2 and 3." | |
| CalAdvocates | | | projects that started before 2023 and 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 | |
| | 6 CalAdvocates-Liberty-2023WMP-06 | 2 CalAdv-06 | Approximation in separate columns, at a minimum; a) Order number Refer to tab "2024" in supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty 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 Image: CalAdvocates-Liberty-2023WMP-06_Liberty Image: C | 8 Grid Design, operations, and maintenance (8.1) 8.1.2 |
| | | | distribution circuits in 2024. For projects that you expect to partially complete in 2024 (i.e., Response Questions 2 and 3." | |
| | | | 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 | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 3 CalAdv-06 | A following information in separate columns, at a minimum; a) Order number Aaron Louie 2/24/2023 4/19/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com) 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 Refer to supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty Response Question disaggregated information related to expenditures and circuit miles treated in the attached table, Cal 4" Image: CalAdvocates-Liberty-2023WMP-06_Liberty Response Question disaggregated disa | 8 Grid Design, operations, and maintenance (8.1) 8.1.2 |
| | | | 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 | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 4 CalAdv-06 | | 8 Grid Design, operations, and maintenance (8.1) 8.1.2 |
| | | | Regarding your PSPS circuit modeling capabilities: a) Please describe your present circuita) Liberty's 2023 WMP section 6.2 includes the baseline PSPS risk analyses and assessmentmodeling capabilities with regard to PSPS decision-making ("PSPS circuit modeling capabilities"), including with what level of granularity theya) Liberty's 2023 WMP section 6.2 includes the baseline PSPS risk analyses and assessmentincluding with what level of granularity theyb) End on the model inputs currently do not incorporate | |
| | | | are able to determine how circuit 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 consider current PSPS thresholds affecting each circuit and any current PSPS mitigation <u>CalAdvocates-Liberty-2023WMP-06_Liberty</u> | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 5 CalAdv-06 | b) Please describe any improvements to the present PSPS circuit modeling capabilities that you controls in place would also need to be factored in and calculated separately to support Aaron Louie 2/24/2023 4/19/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com) Identify any ignitions in 2022 associated with assets where you had an existing corrective Liberty did not have any ignitions in 2022 associated with assets where it had an existing Image: Control in place would also need to be factored in and calculated separately to support Aaron Louie 2/24/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com) Image: Control in place would also need to be factored in and calculated separately to support Aaron Louie 2/24/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com) Image: Control in place would also need to be factored in and calculated separately to support Aaron Louie 2/24/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com) Image: Control in place would also need to be factored in and calculated separately to support Aaron Louie 2/24/2023 1/26/2023 Image: Control in place would also need to be factored in and calculated separately to support Image: Control in place would also need to be factored in and calculated separately to support Image: Control in place would also need to be factored in and calculated separately to support Image: Control in place would also need to be factored in and calculated separately to support Image: Control in place would also need | 6 Risk Analysis Framework (6.2) N/A |
| | | | notification at the time of the ignition. Please provide a spreadsheet listing each such ignition (orrective notification at the time of the ignition (as rows) with the following information in separate columns: a) Unique ignition ID | |
| CalAdvocates | 6 CalAdvocates-Liberty-2023WMP-06 | 6 CalAdv-06 | b) Date of ignition c) Cause of ignition 6.6 d) Type of asset associated with the ignition Aaron Louie 2/24/2023 4/19/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com) | 8 Grid Design, operations, and maintenance (8.1) 8.1.2 |
| | | | Page 55 of Liberty's WMP states, "Liberty has not conducted a wildfire risk assessment using the a) In its 2023 WMP, Liberty provides a map in Figure 5-11 showing its service territory 85th percentile consequence calculation." a) Why hasn't Liberty conducted a wildfire risk overlaid with the Social Vulnerability Index (SVI) and its current Reax wildfire risk (SV | |
| | | | 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. Due to increased risk modeling requirements in the Office of Energy Infrastructure Safety. CalAdvocates-Liberty-2023WMP-07 Liberty | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 1 CalAdv-07 | | 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 CalAdv-07 | 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 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. 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. | 5 Community Values at Risk (5.4) 5.4.3.3 |
| | | | 2.2 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 Response_05232023.pdf (libertyutilities.com) Page 60 of Liberty's WMP states, "Absentee landlords make notification requirements and coordination for O&M activities difficult, sometimes resulting in delayed activities or their 0 Door hangers Talal Harahsheh 5/18/2023 5/23/2023 Response_05232023.pdf (libertyutilities.com) | S Community values at Kisk (5.4) 5.4.5.5 |
| | | | cancellation entirely." a) Please describe what methods or strategies Liberty has adopted to ameliorate the problem noted above. • Mailed letters or postcards | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 3 CalAdv-07 | b) Please describe Liberty's method of maintaining accurate and up-to-date contact information 3 for homeowners and renters in its service territory. Page 60 of Liberty's WMP states, "Liberty is currently working with the [Tahoe Regional Planning] a) No. (3) No. (4) No. (5) No. (4) No. (5) No | 5 Community Values at Risk (5.4) 5.4.5 |
| | | | Agency] to update an existing memorandum of understanding ("MOU") for O&M activities to b) Liberty is in the process of executing an MOU with TRPA. The draft MOU is currently 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. understanding with Tahoe Regional Planning Agency? b) If the answer the part (a) above is CalAdvocates-Liberty-2023WMP-07_Liberty | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 4 CalAdv-07 | Page 64 of Liberty's WMP states: a) Refer to Liberty's 2023 WMP for the analysis that Liberty completed in advance of its | 5 Community Values at Risk (5.4) 5.4.5 |
| | | | Although the current approach provides significant advancements over earlier efforts, it was2023 WMP submission. Refer to the OEIS 2023-2025 Wildfire Mitigation Plan Technicalneither reasonable nor feasible to conduct all the calculations and analyses provided in the Guidelines for the calculations and analysis provided in the guidelines.Guidelines for the calculations and analysis provided in the guidelines.2023-2025 Wildfire Mitigation Plan Technical Guidelines ("Technical Guidelines") prior tob) OEIS released its final 2023-2025 WMP Technical Guidelines on December 6, 2022. In | |
| | | | Liberty's 2023 WMP submission. Liberty, however, is committed to continuing to evolve and late January 2023, Liberty executed an agreement with Technosylva to provide wildfire improve its risk modeling practices and intends to conduct the analyses and calculations risk analytics utilizing its Wildfire Bisk Beduction Model ("WBBM"). Liberty received its | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 5 CalAdv-07 | Talal Harahsheh | 6 Risk Methodology and Assessment 6 |
| | | | capabilities are not factors currently included in the wildfire risk analysis though Liberty intendsvulnerability. Liberty considers Medical Baseline (MBL) and some Access and Functionalto incorporate these factors in its future risk modeling process. a) When Liberty eventuallyNeeds (AFN) customers as physically vulnerable. In future wildfire risk analysis, Liberty canincorporates the factor "physical vulnerability" within future wildfire risk analyses, whatassign weights to different customer categories (i.e., AFN/MBL, Commercial, Residential, | |
| CalAdvocates | 7 CalAdvocates-Liberty-2023WMP-07 | 6 CalAdv-07 | attributes/characteristics would Liberty utilize to define "physical vulnerability"? Critical Facilities) based on physical vulnerability. b) Liberty maintains a list of MBL 6 b) What data does Liberty currently maintain or collect to measure physical vulnerability? customers. Talal Harahsheh 5/18/2023 5/23/2023 8esponse_05232023.pdf (liberty utilities.com) | 6 Risk Methodology and Assessment 6. |
| | | | Please provide an Excel sheet listing of each sustained outage that was caused by equipment failure for the period from 2020 to 2022 in any HFTD area. A sustained outage is an outage that the table outage is an outage that the table outage as a row, with the for five or more minutes. The Excel sheet should list each outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row, with the for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row area for the period from 2020 to 2022 in any HFTD area. A sustained outage as a row area for the period fo | |
| | | | following information in columns: a) ID number of the circuit affected. b) Name of the circuit affected. | |
| CalAdvocates | 8 CalAdvocates-Liberty-2023WMP-08 | 1 CalAdv-08 | A.1C) Date of the outage.Talal Harahsheh5/18/20235/23/2023S/25/2023Response_05252023.pdf (libertyutilities.com)Page 70 of Liberty's WMP states that social vulnerability is not a factor currently included ina) With the final 2023 WMP technical guidelines issued approximately three months priorImage 70 of Liberty's WMP states that social vulnerability is not a factor currently included ina) With the final 2023 WMP technical guidelines issued approximately three months priorImage 70 of Liberty's WMP states that social vulnerability is not a factor currently included ina) With the final 2023 WMP technical guidelines issued approximately three months priorImage 70 of Liberty's WMP states that social vulnerability is not a factor currently included ina) With the final 2023 WMP technical guidelines issued approximately three months priorImage 70 of Liberty's WMP states that social vulnerability is not a factor currently included ina) With the final 2023 WMP technical guidelines issued approximately three months priorImage 70 of Liberty's WMP states that social vulnerability is not a factor currently included ina) With the final 2023 WMP technical guidelines issued approximately three months prior | 8 Grid Design, operations, and maintenance (8.1) |
| | | | 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 process. 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 | |
| | | | to Liberty's 2023 WMP submission. b) State when Liberty anticipates being able to include social vulnerability as part of Liberty's c) See Response 1b. | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 1 CalAdv-09 | | 6 Risk Methodology and Assessment 6. |
| | | | Page 70 of Liberty's WMP states that physical vulnerability is not a factor currently included in 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 physicalLiberty'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 | |
| | | | process. a) Please identify the constraint(s) that hindered the incorporation of physicalcharacteristics of structures to their survivability in wildland fires. Put differently, it isvulnerability prior to Liberty's 2023 WMP submission.Liberty's understanding that fragility curves to quantify a structure's probability of beingb) State when Liberty anticipates being able to include physical vulnerability as part of Liberty'sdamaged or destroyed in a fire based on its physical characteristics do not exist.CalAdvocates-Liberty-2023WMP-09_Libertycharacteristics do not exist. | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 2 CalAdv-09 | | 6 Risk Methodology and Assessment 6. |
| | | | 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. its 2023 WMP submission due to time constraints. | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 3 CalAdv-09 | a) Please identify the constraint(s) that hindered the incorporation of coping capability prior to Liberty's 2023 WMP submission. 3 b) State when Liberty anticipates being able to include coping capability as part of Liberty's risk (c) See Response 3b. Talal Harabsheb | 6 Risk Methodology and Assessment 6. |
| | | | h) State when Liberty anticipates being able to include coning capability as part of Liberty's risk c) See Response 3b. 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 risk analysis: Equipment/assets, Topography, Weather, Vegetation, Climate change, Assets at Liberty's equipment and assets for use in fire spread modeling. | |
| | | | risk, and Fire ignition and spread. Please explain how each of these factors impacts Liberty's quantification of risk at the circuit c) Weather an input to Liberty's fire spread modeling. | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 4 CalAdv-09 | level: d) Vegetation: Vegetation is an input to Liberty's fire spread modeling. CalAdvocates-Liberty-2023WMP-09_Liberty a) Fourinment/assets e) Climate change: Liberty conducted climate-adjusted fire spread modeling. Talal Harahsheh Page 70 of Liberty's WMP states the following factors are included as part of Liberty's wildfire a) For the reasons stated below, no formal processes are currently in place to verify the a) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in place to verify the b) For the reasons stated below, no formal processes are currently in pl | 6 Risk Methodology and Assessment 6. |
| | | | risk analysis: 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 – Topography, weather, vegetation, climate change, assets at risk: Liberty is an end user – ort a developer – of these datasets that serve as inputs to its fire spread modeling. In all | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 5 CalAdv-09 | .5 Vegetation Cases. Liberty uses open-source, widely-used, and industry standard data sets developed Tala 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 from fires caused by sources other than utilities as in the Technical Guidelines." Liberty's system is a grid resiliency issue that Liberty may Impacts from other fires to Liberty's system is a grid resiliency issue that Liberty may Impacts from other fires to Liberty's system is a grid resiliency issue that Liberty may Impacts from other fires to Liberty's system is a grid resiliency issue that Liberty may Impacts from other fires to Liberty's system is a grid resiliency issue that Liberty may Impacts from other fires to Liberty's system is a grid resiliency issue that Liberty may | 6 Risk Methodology and Assessment 6. |
| | | | 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 CalAdv-09 | A.6Talal Harahsheh5/26/20236/1/20236/1/2023CalAdvocates-Liberty-2023WMP-09_Liberty0.6Talal Harahsheh5/26/20236/1/20236/1/2023Response_06012023.pdf (libertyutilities.com) | 6 Risk Methodology and Assessment 6. |
| | | | 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 | |
| | | | and PSPS risk. b) Has Liberty consulted with any agencies, universities, research groups, or other entities on the WMP from a previous draft. | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 7 CalAdv-09 | 1.7calculation of the abovementioned weighting of wildfire risk and PSPS risk? Please list thoseTalal Harahsheh5/26/20236/1/20236/1/2023Response_06012023.pdf (libertyutilities.com)Page 96 of Liberty's WMP presents Table 6-7: Liberty Top-Risk Circuits, which provides risk scoresa) Liberty works on multiple circuits simultaneously.a) Liberty works on multiple circuits simultaneously.b) Control | 6 Risk Methodology and Assessment 6. |
| | | | 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) Liberty plans to conduct grid design and system hardening work on 16 of the top 20 risk- | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 8 CalAdv-09 | 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 d) As stated in Section 7.2.2.3 of its 2023 WMP, Liberty does not yet have sufficient information to calculate the risk reductions for top-risk circuits and plans to develop an trail Harahshen 5/26/2023 6/1/2023 6/1/2023 6/1/2023 Response_06012023.pdf (libertyutilities.com) | 6 Risk Methodology and Assessment 6. |
| | | | 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 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 1 should add these new columns to Table 6-7: CalAdvocates-Liberty-2023WMP-09_Liberty | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 9 CalAdv-09 | | 6 Risk Methodology and Assessment 6. |
| | | | In late January 2023, Liberty signed a formal agreement with Direxyon to pilot its asset risk decision-making solution to be incorporated, in part, in this WMP. If the pilot is successful for included GIS pole information and asset inspection information that was used to model | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 10 CalAdv-09 | 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 plans given budget and resource constraints a) findings and financial costs of inspection and repair/replacement. Data was also provided Talal Harahsheh 5/26/2023 6/1/2023 6/1/2023 Response 06012023.pdf (libertyutilities.com) | 6 Risk Methodology and Assessment 6. |
| | | | 1.10 investments and repairs and maintenance plans given budget and resource constraints. a) findings. and financial costs of inspection and repair/replacement. Data was also provided Talal Harahsheh 5/26/2023 6/1/2023 Response_06012023.pdf (libertyutilities.com) Page 107 of Liberty's WMP states "Liberty's strategy development for this WMP did not utilize on utilizing the wildfire risk scores developed by Reax." a) Yes. a) Yes. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. b) Liberty plans on utilizing the wildfire risk scores d | O INISK METHODOlogy and Assessment D. |
| | | | a) Does Liberty plan on utilizing the wildfire risk scores developed by Reax to help plan future decisions regarding wildfire mitigation? () As stated in Section 7.1.4.2 of its 2023 WMP, Liberty plans to have a cohesive mitigation portfolio plan approach in its next WMP that incorporates data analytics and risk- | |
| CalAdvocates | 9 CalAdvocates-Liberty-2023WMP-09 | 11 CalAdv-09 | 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 reduction performance over time. | 7 Wildfire Mitigation Strategy Development |
| | | | 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 Electric Lines and Equipment was erroneously established at 706.3 miles, causing Liberty to miss territory. Liberty does not perform patrol inspections in areas where detailed inspections in areas where d | |
| | | | a) Explain how Liberty mistakenly set a target of 706.3 miles. b) State the basis for why Liberty miles minus overhead detailed inspection miles. 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 | |
| CalAdvocates | 10 CalAdvocates-Liberty-2023WMP-10 | 1 CalAdv-10 | | 8 Grid Design, operations, and maintenance (8.1) 8.1.3 |

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|------------------|----|---------------------------------|---|----------------|
| | | | | |
| 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 |
| | | | | |
| 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 |
| | | | | |
| CalAdvocates | 12 | CalAdvocates-Liberty-2023WMP-12 | 3 | CalAdv-12-12.3 |
| | 12 | | 4 | |
| 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 |
| | | | | |
| 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 |
| 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 |
| | | | Э | CaiAuv-13-13.3 |

| | | | On page 174 of its WMP, Liberty states that it completed Quality Assurance and Quality Control | a) 24 | | | | | | |
|--|---|------------------|---|---|--------------|-------------|---|---|-----|--|
| | | | (QA/QC) on 0.0044% of its detailed asset inspections in 2022, while Liberty's target was to QA/QC 0.0050% of the detailed asset inspections in 2022. Please respond to the following: | b) Yes. c) N/A | | | | 1 | | |
| vocates-Liberty-2023WMP-10 | 2 | CalAdv-10-10.2 | b) Are both transmission and distribution detailed inspections included in the 0.0044% figure? | d) 15 transmission (60 kV) and 9 distribution. e) Refer to file: CalAdvocates-Liberty-2023WMP-10_Liberty Response Question 2. f) Liberty targeted 0.5% of detailed inspections as its OA/OC target as a starting point for Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-10_Liberty_ 6/2/2023 Response_06022023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance |
| | | | On page 182 of its WMP, Liberty states that it implemented its asset inspection QA/QC in 2022 | a) The discrepancy is a typo. Liberty's QA/QC target for detailed asset inspections is 0.5%. b) N/A | 5/20/2025 | 0, 1, 2020 | | | | |
| | | | 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. | | | | CalAdvocates-Liberty-2023WMP-10 Liberty | | | |
| vocates-Liberty-2023WMP-10 | 3 | CalAdv-10-10.3 | 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). On page 182 of its WMP, Liberty states that it implemented its asset inspection QA/QC in 2022 | Talal Harahsheh | 5/26/2023 | 6/1/2023 | 6/2/2023 Response_06022023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance |
| | | | | b) Six re-inspections noted minor differences.c) Examples include noting Level 3 differences such as foreign sign, loose secondary down | | | | | | |
| vocates-Liberty-2023WMP-10 | 4 | CalAdv-10-10.4 | infractions during the re-inspections if differences were noted at all. Please respond to the following: a) How many third-party OA/OC checks were completed on detailed asset inspections in 2022? | guy, and auto splice 1" away from insulator. Talal Harahsheh | 5/26/2023 | 6/1/2023 | CalAdvocates-Liberty-2023WMP-10_Liberty_ 6/2/2023 Response_06022023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance |
| | · | | On page 183 of its WMP, Liberty states: | a) Liberty halted its detailed inspections on January 1st, 2023, with the exception of detailed underground inspections due in 2023. | 5/25/2525 | 0,1,2020 | | | | |
| | | | 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. | | | | | | |
| vocates-Liberty-2023WMP-10 | 5 | CalAdv-10-10.5 | Please respond to the following: | 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 | 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> | | 8 | Grid Design, operations, and maintenance |
| | | | inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and | overlap of infractions found in its 2020 full system survey and prioritize repairs to infractions found during the system survey | | | | | | |
| | c | Cal A du 10 10 C | a) Explain Liberty's rationale for halting detailed inspections in 2023 to reduce the number of | 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 | F /25 /2022 | C /1 /2022 | CalAdvocates-Liberty-2023WMP-10_Liberty | | 0 | |
| vocates-Liberty-2023WMP-10 | 0 | CalAdv-10-10.6 | | completing any overhead detailed inspections.Talal Harahsheha) Liberty's current staffing resources include:a.a. Inspections: Five internal inspectors and one contract inspectora. | 5/26/2023 | 6/1/2023 | 6/2/2023 <u>Response_06022023.pdf (libertyutilities.com)</u> | | 8 | Grid Design, operations, and maintenance |
| | | | 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 | | | | | N/A | N/A |
| vocates-Liberty-2023WMP-10 | 7 | 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 | 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 | 6/2/2023 <u>CalAdvocates-Liberty-2023WMP-10_Liberty</u> 6/2/2023 <u>Response_06022023.pdf (libertyutilities.com)</u> | | | |
| | | | 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." | | | | | | | |
| | | | 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- | | | |
| vocates-Liberty-2023WMP-11 | 1 | CalAdv-11-11.1 | | Talal Harahsheh 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. | 6/1/2023 | 6/6/2023 | 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 | Risk Evaluation (7.1) |
| | | | a) What is the total number of "discussion points" that Liberty will plot on Figure 7-1 while | b) Examples of discussion points included in the risk evaluation process are: identification of all risk events; | | | | | | |
| vocates-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: | 6/1/2023 | 6/6/2023 | <u>Liberty Response to DR CalAdvocates-Liberty-</u> 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 | Risk Evaluation (7.1) |
| | | | | 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. c) N/A | | | Liberty Response to DR CalAdvocates-Liberty- | | | |
| vocates-Liberty-2023WMP-11 | 3 | CalAdv-11-11.3 | selected for the circuit. Pages 116-117 of Liberty's WMP identify the Muller circuit as being in an area of elevated | d) Yes. Talal Harahsheh a) Yes. | 6/1/2023 | 6/6/2023 | 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 | Risk Evaluation (7.1) |
| | | | , , , | b) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys. c) N/A | | | | | | |
| vocates-Liberty-2023WMP-11 | 4 | CalAdv-11-11.4 | | e) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys, Liberty is also planning to do some system hardening on this Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 | Risk Evaluation (7.1) |
| | | | 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 | a) Yes. b) Liberty is planning to complete two covered conductor projects on Meyers circuits in | | | | | | |
| | | | a) Does Liberty have any system hardening mitigation work planned in 2023 for the Meyers | 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 | | | Liberty Response to DR CalAdvocates-Liberty- | | | |
| vocates-Liberty-2023WMP-11 | 5 | CalAdv-11-11.5 | 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 Harahsheh During the 2023-2025 WMP cycle. | 6/1/2023 | 6/6/2023 | | | 7 | Risk Evaluation (7.1) |
| | | | 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." | | | | | | | |
| vocates-Liberty-2023WMP-11 | 6 | CalAdv-11-11.6 | When does Liberty anticipate it will have expanded its interim mitigation strategy to incorporate asset management measures, as referenced in the quote? | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 | Risk Evaluation (7.1) |
| | | | Page 128 of Liberty's WMP states, "Liberty is actively planning and executing wildfire mitigation initiatives while developing its risk based decision-making process." | | 0,1,2020 | 0,0,2020 | | | | |
| | | | | 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 CalAdvecates Liberty | | | |
| vocates-Liberty-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: | Talal Harahsheh a) Examples of evaluation criteria Liberty considered are cost, accuracy of risk | 6/1/2023 | 6/6/2023 | 6/6/2023 <u>Liberty Response to DR CalAdvocates-Liberty-</u> 6/6/2023 <u>2023WMP-11.pdf (libertyutilities.com)</u> | | 7 | Risk Evaluation (7.1) |
| | | | In conjunction with this study, Liberty also plans to assess the asset risk reduction and | identification and model outputs, system compatibility, the feasibility of scenarios and the ability to operationalize model outputs given available resources. | | | | | | |
| vocates-Liberty-2023WMP-11 | 0 | Cal Adv. 11 11 0 | integrate asset risk and detailed vegetation risk scores to help asset and vegetation managers | 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. Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 | Risk Evaluation (7.1) |
| | 0 | CalAdv-11-11.8 | better assess operational risk to plan and adjust work activities for significant weather event Page 138 of Liberty's WMP states: Liberty's risk-informed decision-making framework is under development. Liberty's engineering, | a) Liberty plans to have an initial risk-informed decision-making framework for overhead | 0/1/2025 | 0/0/2023 | 6/6/2023 2023WWP-11.pdf (iibertydtinties.com) | | / | |
| | | | planning, and regulatory staff will need three to six months post-product/service delivery of all | | | | | | | |
| vocates-Liberty-2023WMP-11 | 9 | CalAdv-11-11.9 | | studies (i.e., Technosylva modeling results, Reax modeling results, Direxyon outputs), OEIS risk modeling guidelines, and collaborative discussions with stakeholders through Talal Harahsheh | 6/1/2023 | 6/6/2023 | 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 | Risk Evaluation (7.1) |
| | | | provide a breakdown of the actual spends including at least the following categories: | on March 8, 2023. b) See response 1a. | | | | | | |
| | | | 0 | c) See response 1b. | | | CalAdvocates-Liberty-2023WMP-12_Liberty_ | | | |
| vocates-Liberty-2023WMP-12 | 1 | CalAdv-12-12.1 | | Talal Harahsheh a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS on March 8, 2023. | 6/6/2023 | 6/9/2023 | 6/9/2023 <u>Response_06092023.pdf (libertyutilities.com)</u> | | 4 | Proposed Expenditures (4.3) |
| | | | categories: | b) See response 2a. c) See response 2b. | | | | | | |
| vocates-Liberty-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) | | 4 | Proposed Expenditures (4.3) |
| | | | | 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_ | | | |
| vocates-Liberty-2023WMP-12 | 3 | CalAdv-12-12.3 | | Talal Harahsheh a) If Liberty VM field personnel are unable to perform their job function due to a | 6/6/2023 | 6/9/2023 | 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 | Vegetation Management and Inspections |
| | | | 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. 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. | | | | | | |
| vocates-Liberty-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. | 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 Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-12_Liberty_ 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 | Vegetation Management and Inspections |
| | | | 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 | | | | | | |
| | | | 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 complete work orders and mitigate identified tree conditions within the timelines | | | CalAdvocates-Liberty-2023WMP-12 Liberty | | | |
| vocates-Liberty-2023WMP-12 | 5 | CalAdv-12-12.5 | 181+ days. Please provide copies of the following documents: | specified in its VM-05 based on the priority level of assigned to the vegetation work order Talal Harahsheh a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) | 6/6/2023 | 6/9/2023 | 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 | Vegetation Management and Inspections |
| | | | a) Corporate Emergency Management Plan (CEMP), dated April 27, 2022, referenced on p. 284 of your WMP | b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook | | | | 2 | | |
| vocates-Liberty-2023WMP-13 | 1 | CalAdv-13-13.1 | b) Liberty Utilities Public Safety Power Shutoff Playbook, dated June 13, 2022, referenced on p. 284 of your WMP | Talal Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-13_Liberty 6/9/2023 Response 06092023.pdf (libertyutilities.com) | | 8 | Emergency Preparedness (8.4) |
| | | | specific plan for communicating with NV Energy including the information to be provided is | 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- | | | CalAdvocates-Liberty-2023WMP-13 Liberty | 1 | | |
| vocates-Liberty-2023WMP-13 | 2 | CalAdv-13-13.2 | 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. On p. 162 of its WMP, Liberty states "[T]hese programs, in particular Liberty's SRP program, may | energizations." overbroad, unduly burdensome, and not reasonably calculated to lead to Talal Harahsheh | 6/6/2023 | 6/9/2023 | 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 | Emergency Preparedness (8.4) |
| | | | reduce the need for PSPS in certain areas." a) Please explain how Liberty's SRP program may reduce the need for PSPS in certain areas. | 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, | | | | | | |
| vocates-Liberty-2023WMP-13 | 3 | CalAdv-13-13.3 | b) Please describe the decision-making process for a situation in which Liberty anticipates PSPS 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 | 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 proven to be low enough to make this call. Liberty will be evaluating this topic with UNR Talal Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-13_Liberty 6/9/2023 Response 06092023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance |
| | | | Please provide a description of the weather conditions in which Liberty enables its SRP program. b) Please identify the months or seasons in which Liberty enables its SRP program. | 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 | | | CalAdvocates-Liberty-2023WMP-13 Liberty | | | |
| vocates-Liberty-2023WMP-13 | 4 | CalAdv-13-13.4 | On p. 162 of its WMP, Liberty states "Liberty will be expanding the 2022 Fast Trip, or SRP, pilot | enabled in the summer and early fall when the moisture content is low and temperatures and wind conditions can be high. a) Liberty utilized a different program in 2021. Prior to the SRP program pilot in 2022, | 6/6/2023 | 6/9/2023 | 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance |
| | | | project because of its effectiveness" a) In Liberty's response to CalAdvocates-Liberty-2023WMP-03, Question 1, the excel sheet | 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 | | | | | | |
| vocates-Liberty-2023WMP-13 | 5 | CalAdv-13-13.5 | 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 program began in 2021 or if Liberty used a different program for this de-energization. | reduces ignition risk. | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-13_Liberty_ 6/9/2023 Response 06092023.pdf (libertyutilities.com) | | 8 | Grid Design, operations, and maintenance |
| | 5 | | Liberty's response to question 8 of data request CalAdvocates-Liberty-2023WMP-11 discusses an | b) In 2022. Liberty utilized a mix of SRP settings and "wildfire mode" settings because the Talal Harahsheh a) In its evaluation of whether to move forward with the proposed solution from IBM, Liberty considered factors including: | 0,0,2020 | 0, 3, 2023 | | | | |
| | | | response states, "Liberty has decided to not move forward with IBM's proposed solution at this time." | cost; system compatibility, particularly the risk of moving forward with the solution prior to | | | Cal Advantas Liberty 2022/10/22 11 11 | | | |
| vocates-Liberty-2023WMP-14 | 1 | CalAdv-14-14.1 | a) Please explain why Liberty has decided not to move forward with the proposed solution from IBM to consolidate its risk data sources. Please explain why your QDR for Q1 of 2022 reports the total number of distribution ignitions in | • the ability to operationalize model outputs. Talal Harahsheh | 6/8/2023 | 6/13/2023 | 6/13/2023 <u>CalAdvocates-Liberty-2023WMP-14_Liberty</u> <u>6/13/2023 Response_06132023.pdf (libertyutilities.com)</u> | | | |
| | | | 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. | | | | | | |
| vocates-Liberty-2023WMP-15 | 1 | CalAdv-15-15.1 | | Talal Harahsheh | 6/14/2022 | 6/19/2023 | CalAdvocates-Liberty-2023WMP-15_Liberty_ 6/20/2023 Response 06202023.pdf (libertyutilities.com) | | | |
| | 1 | CalAUV-15-15.1 | | a) One. b) Three. | 6/14/2023 | 0/ 19/ 2023 | | | | |
| | | | | c) One. | | | | | | |
| | | I | | Talal Harahsheh | 6/14/2023 | 6/19/2023 | CalAdvocates-Liberty-2023WMP-15_Liberty 6/20/2023 Response_06202023.pdf (libertyutilities.com) | | | |
| ocates-Liberty-2023WMP-15 | 2 | CalAdv-15-15.2 | Please provide an Excel sheet listing all ignitions that occurred on your system in 2020 through | | 0, = 1, =0=0 | 0, 20, 2020 | | | | |
| vocates-Liberty-2023WMP-15 | 2 | CalAdv-15-15.2 | Please provide an Excel sheet listing all ignitions that occurred on your system in 2020 through 2022. Each ignition should be a row. For each ignition, please provide the following columns of data: | | | | | 1 | | |
| vocates-Liberty-2023WMP-15 vocates-Liberty-2023WMP-15 | 2 | CalAdv-15-15.2 | | | 6/14/2023 | | CalAdvocates-Liberty-2023WMP-15_Liberty 6/20/2023 Response 06202023.pdf (libertyutilities.com) | 1 | | |

| | | | 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 | 1 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? b) Are both transmission and distribution detailed inspections included in the 0.0044% figure? | c) N/A d) 15 transmission (60 kV) and 9 distribution. e) Refer to file: CalAdvocates-Liberty-2023WMP-10_Liberty Response Question 2. | | | | CalAdvocates-Liberty-2023WMP-10_Liberty_ | | |
| 10 CalAdvocates-Liberty-2023WMP-10 | 2 | CalAdv-10-10.2 | 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 Harahsheh | 5/26/2023 | 6/1/2023 6 | 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 infractions during the re-inspections if differences were noted at all. | b) N/A | | | | | | |
| 10 CalAdvocates-Liberty-2023WMP-10 | 3 | CalAdv-10-10.3 | a) Please explain the apparent discrepancy between the targets stated on pages 174 and 182 fo OA/OC of detailed asset inspections (0.005% on page 174 and 0.5% on page 182). | | Talal Harahsheh | 5/26/2023 | 6/1/2023 | <u>CalAdvocates-Liberty-2023WMP-10_Liberty</u> 6/2/2023 <u>Response_06022023.pdf (libertyutilities.com)</u> | | 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. Minimal differences were noted by the third-party inspectors, who found only very minor | a) 24 b) Six re-inspections noted minor differences. c) Examples include noting Level 3 differences such as foreign sign, loose secondary down | | | | | | |
| | | | infractions during the re-inspections if differences were noted at all. Please respond to the following: | guy, and auto splice 1" away from insulator. | | | | CalAdvocates-Liberty-2023WMP-10_Liberty_ | | |
| 10 CalAdvocates-Liberty-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 | Talal Harahsheh | 5/26/2023 | 6/1/2023 6 | 6/2/2023 <u>Response_06022023.pdf (libertyutilities.com)</u> | | 8 Grid Design, operations, and maintenance (8.1) 8.1.6 |
| | | | 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 | | | | | | | |
| 10 CalAdvocates-Liberty-2023WMP-10 | 5 | CalAdv-10-10.5 | maintenance work orders and resume detailed inspections in 2024." Please respond to the following: | d) Liberty is currently planning to resume its detailed inspections on January 1st, 2024. e) Liberty will remain in compliance with GO95 and 165. | 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> | | 8 Grid Design, operations, and maintenance (8.1) 8.1.7 |
| | | | On page 183 of its WMP, Liberty states: As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and internal crews are working to expedite the process. | a) Liberty 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 | | | | | | |
| | | | Please respond to the following: a) Explain Liberty's rationale for halting detailed inspections in 2023 to reduce the number of | 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 | | | | CalAdvocates-Liberty-2023WMP-10_Liberty_ | | |
| 10 CalAdvocates-Liberty-2023WMP-10 | 6 | CalAdv-10-10.6 | open work orders on Liberty's system. as referenced in the quote above. a) Describe Liberty's current staffing resources allocated to each of the following items under asset management, including but not limited to: | completing any overhead detailed inspections. a) Liberty's current staffing resources include: a. Inspections: Five internal inspectors and one contract inspector | Talal Harahsheh | 5/26/2023 | 6/1/2023 6 | 6/2/2023 <u>Response_06022023.pdf (libertyutilities.com)</u> | | 8 Grid Design, operations, and maintenance (8.1) 8.1.7 |
| | | | 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 | | | | | | N/A N/A N/A |
| 10 CalAdvocates-Liberty-2023WMP-10 | 7 | 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 fo asset management and inspection. a) Yes | r 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> | | |
| | | | refinements and approaches by onboarding new vendors to help develop a formal risk model decision framework for Liberty." | | | | | | | |
| 11 CalAdvocates-Liberty-2023WMP-11 | 1 | CalAdv-11-11.1 | 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 description of how Liberty is utilizing each vendor to develop its formal risk model decision | | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 Risk Evaluation (7.1) 7.1.1 |
| | | | 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: | risk evaluation process as Liberty advances its risk model decision framework. | | | | | | |
| | | | a) What is the total number of "discussion points" that Liberty will plot on Figure 7-1 while conducting its risk evaluation process? b) Please list all of the "discussion points" that Liberty will plot on Figure 7-1 as part of the risk | b) Examples of discussion points included in the risk evaluation process are: identification of all risk events; likelihood of wildfire risk drivers; | | | | Liberty Response to DR CalAdvocates-Liberty- | | |
| 11 CalAdvocates-Liberty-2023WMP-11 | 2 | CalAdv-11-11.2 | identification and analysis. Pages 116-117 of Liberty's WMP identify the Topaz circuit as being in an area of elevated wildfir | • impacts of significant weather (snow and wind) on asset degradation and health: re a) Yes. | Talal Harahsheh | 6/1/2023 | 6/6/2023 6 | 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 Risk Evaluation (7.1) 7.1.1 |
| | | | 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 Topaz circui | 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 it repairing various poles on this circuit to address needs found during system surveys. | | | | | | |
| 11 CalAdvocates-Liberty-2023WMP-11 | 3 | 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. | c) N/A d) Yes. | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 Risk Evaluation (7.1) 7.1.3 |
| | | | 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 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- | | |
| 11 CalAdvocates-Liberty-2023WMP-11 | 4 | CalAdv-11-11.4 | 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 | 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 Risk Evaluation (7.1) 7.1.3 |
| | | | 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 | | | | | | |
| 11 CalAdvocates-Liberty-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 | 6/6/2023 <u>Liberty Response to DR CalAdvocates-Liberty-</u> 2023WMP-11.pdf (libertyutilities.com) | | 7 Risk Evaluation (7.1) 7.1.3 |
| | | | 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." | s | | | | | | |
| 11 CalAdvocates-Liberty-2023WMP-11 | 6 | CalAdv-11-11.6 | When does Liberty anticipate it will have expanded its interim mitigation strategy to incorporat asset management measures, as referenced in the quote? | te | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 Risk Evaluation (7.1) 7.1.4 |
| | 0 | | Page 128 of Liberty's WMP states, "Liberty is actively planning and executing wildfire mitigation initiatives while developing its risk based decision-making process." | a) No. b) N/A | | 0/1/2023 | 0,0,2023 | | | |
| | | | 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- | | |
| 11 CalAdvocates-Liberty-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) | | 7 Risk Evaluation (7.1) 7.1.4 |
| | | | 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 | | | | | | | |
| 11 CalAdvocates-Liberty-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 | , , , | Talal Harahsheh | 6/1/2023 | 6/6/2023 | Liberty Response to DR CalAdvocates-Liberty- 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 Risk Evaluation (7.1) 7.2.2 |
| | | | 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 risk studies to fully engage with internal subject matter experts to evaluate the results of the risk analyses. | 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- | | |
| 11 CalAdvocates-Liberty-2023WMP-11 | 9 | CalAdv-11-11.9 | On pp. 29-30 of its WMP, Liberty describes its actual WMP spends for the 2020-2022 cycle. Pleas | risk modeling guidelines, and collaborative discussions with stakeholders through | Talal Harahsheh | 6/1/2023 | 6/6/2023 6 | 6/6/2023 2023WMP-11.pdf (libertyutilities.com) | | 7 Risk Evaluation (7.1) 7.2.3 |
| | | | provide a breakdown of the actual spends including at least the following categories: Risk assessment and modeling Grid design and system hardening | b) See response 1a. c) See response 1b. | | | | | | |
| 12 CalAdvocates-Liberty-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 O4 2022 WMP Quarterly Data Report (ODR) submitted to OFIS | 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> | | 4 Proposed Expenditures (4.3) |
| | | | provide a breakdown of the described proposed expenditures including at least the following categories: | on March 8, 2023. b) See response 2a. | | | | | | |
| 12 CalAdvocates-Liberty-2023WMP-12 | 2 | CalAdv-12-12.2 | Risk assessment and modeling Grid design and system hardening Asset management and inspections | c) See response 2b. | Talal Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-12_Liberty_ 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 | to page 202. There should only be one row for "Vegetation Management Inspection | | | | | | |
| | | | Initiative Activity "Program – LiDAR" is blank. | Program – LiDAR" and the initiative activity row was inadvertently split up due to the page break. | | | | CalAdvocates-Liberty-2023WMP-12 Liberty | | |
| 12 CalAdvocates-Liberty-2023WMP-12 | 3 | CalAdv-12-12.3 | On p. 209 of its WMP, Liberty provides Figure 8-4: "Liberty VM Inspection Overview." | a) If Liberty VM field personnel are unable to perform their job function due to a | Talal Harahsheh | 6/6/2023 | 6/9/2023 6 | 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 Vegetation Management and Inspections (8.2) 8.2.1.2 |
| | | | a) Please describe what steps Liberty takes if a customer refuses access to his or her property fo either a vegetation inspection or a vegetation maintenance activity. b) Please provide any internal protocols, handbooks, or other documents that describe the | or 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. | | | | | | |
| 12 CalAdvocates-Liberty-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. | 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 Harahsheh | 6/6/2023 | 6/9/2023 | 6/9/2023 <u>CalAdvocates-Liberty-2023WMP-12_Liberty</u> <u>6/9/2023 Response_06092023.pdf (libertyutilities.com)</u> | | 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) In this table, does "age" refer to days since the work order was first created or days since the | 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 | | | | | | |
| | _ | | work order's due date? b) Please explain why there are 2,588 past due work orders in HFTD Tier 2 Areas with ages of | 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 | | | | <u>CalAdvocates-Liberty-2023WMP-12_Liberty</u> | | |
| 12 CalAdvocates-Liberty-2023WMP-12 | 5 | CalAdv-12-12.5 | 181+ davs. Please provide copies of the following documents: a) Corporate Emergency Management Plan (CEMP), dated April 27, 2022, referenced on p. 284 o | specified in its VM-05 based on the priority level of assigned to the vegetation work order a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) of b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook | Talal Harahsheh | 6/6/2023 | 6/9/2023 (| 6/9/2023 <u>Response_06092023.pdf (libertyutilities.com)</u> | | 8 Vegetation Management and Inspections (8.2) 8.2.6 |
| | | | your WMP b) Liberty Utilities Public Safety Power Shutoff Playbook, dated June 13, 2022, referenced on p. | | | | | CalAdvocator Liberty 2022/4/242 42 11 | 2 | |
| 13 CalAdvocates-Liberty-2023WMP-13 | 1 | CalAdv-13-13.1 | 284 of your WMP On p. 311 of its WMP, Liberty states "NV Energy is the [Transmission Owner] for Liberty A | a) Yes. | Talal Harahsheh | 6/6/2023 | 6/9/2023 | 6/9/2023 <u>CalAdvocates-Liberty-2023WMP-13_Liberty</u> 6/9/2023 <u>Response_06092023.pdf (libertyutilities.com)</u> | | 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 | | | | | | |
| 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 Harahsheh | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-13_Liberty_ 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 Emergency Preparedness (8.4) 8.4.3.2 |
| | 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." | | | 0,0,2023 | 0, 5, 2025 | | | |
| | | | 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 | | | | | CalAdvocates-Liberty-2023WMP-13 Liberty | | |
| 13 CalAdvocates-Liberty-2023WMP-13 | 3 | CalAdv-13-13.3 | conditions but decides to use its SRP program instead <u>c) Please list all dates in 2022 when Liberty anticipated PSPS conditions but use its SRP program</u> Please provide a description of the weather conditions in which Liberty enables its SRP program | | Talal Harahsheh | 6/6/2023 | 6/9/2023 | 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 Grid Design, operations, and maintenance (8.1) 8.1.2.6 |
| | | | | conditions, temperature conditions, and moisture content. b) The area of Liberty service territory and weather conditions in any given year or month | | | | | | |
| 13 CalAdvocates-Liberty-2023WMP-13 | 4 | CalAdv-13-13.4 | | 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. | | 6/6/2023 | 6/9/2023 | CalAdvocates-Liberty-2023WMP-13_Liberty_ 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 Grid Design, operations, and maintenance (8.1) 8.1.2.6 |
| | | | 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) 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 i | in impacts relay coordination and reduces incident energy on fault conditions, which in turn reduces ignition risk. | | | | CalAdvocates-Liberty-2023WMP-13_Liberty_ | | |
| 13 CalAdvocates-Liberty-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 and | b) In 2022. Liberty utilized a mix of SRP settings and "wildfire mode" settings because the an a) In its evaluation of whether to move forward with the proposed solution from IBM, | Talal Harahsheh | 6/6/2023 | 6/9/2023 6 | 6/9/2023 Response_06092023.pdf (libertyutilities.com) | | 8 Grid Design, operations, and maintenance (8.1) 8.1.2.6 |
| | | | "IBM Maximo project" and when the platform would be complete and operational. Liberty's response states, "Liberty has decided to not move forward with IBM's proposed solution at this time." | Liberty considered factors including: cost; system compatibility, particularly the risk of moving forward with the solution prior to | | | | | | |
| 14 CalAdvocates-Liberty-2023WMP-14 | 1 | CalAdv-14-14.1 | a) Please explain why Liberty has decided not to move forward with the proposed solution from IBM to consolidate its risk data sources. | SAP implementation later this year; and the ability to operationalize model outputs. | Talal Harahsheh | 6/8/2023 | 6/13/2023 6/ | /13/2023 <u>CalAdvocates-Liberty-2023WMP-14_Liberty</u> /13/2023 <u>Response_06132023.pdf (libertyutilities.com)</u> | | |
| | | | 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. | n 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. | | | | | | |
| | | | | | Talal Hamilton | | | (20/2022 Response 06202022 pdf (libertyutilities com) | | |
| 15 CalAdvocates-Liberty-2023WMP-15 | 1 | CalAdv-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. | Talal Harahsheh | 6/14/2023 | 6/19/2023 6/ ا | /20/2023 <u>Response_06202023.pdf (libertyutilities.com)</u> | | |
| | | | c) How many reportable distribution ignitions did Liberty experience in 2022? | c) One. | | | | CalAdvocatos Liborty 2022/4/545 45 115 | | |
| 15 CalAdvocates-Liberty-2023WMP-15 | 2 | CalAdv-15-15.2 | Please provide an Excel sheet listing all ignitions that occurred on your system in 2020 through | Refer to file: CalAdvocates-Liberty-2023WMP-15 Liberty Response Question 3. | Talal Harahsheh | 6/14/2023 | 6/19/2023 6/ | <u>CalAdvocates-Liberty-2023WMP-15_Liberty</u> /20/2023 <u>Response_06202023.pdf (libertyutilities.com)</u> | | |
| | | | 2022. Each ignition should be a row. For each ignition, please provide the following columns of data: | | | | | | | |
| | 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 6/ | CalAdvocates-Liberty-2023WMP-15_Liberty_ /20/2023 Response_06202023.pdf (libertyutilities.com) | | |
| 15 CalAdvocates-Liberty-2023WMP-15 | | | | | | | 31 | | · · | |

| | | | 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 pre-submission. | | | | | |
|---------------------|---------------------------|--------------|--|--------------|--------------|-------------------------|--|--|
| | | | associated supporting documents required for the Pre-submission 2023-2025 WMP Base Plan | | | | GPI_Liberty_2023WMP_01_Liberty1 | WMP Pre- |
| een Power Institute | 1 GPI-Liberty-2023WMP-01 | 1 GPI-01-1.1 | filing. Q01. Regarding Weather Station Standards and Locations: Response to Q01.: | Gregg Morris | 3/6/2023 | 3/9/2023 3/8/2023 | 3 Response_03082023.pdf (libertyutilities.com) | Submission Administrative N |
| | | | a. Liberty states in section 8.3.2.1 of its WMP (p. 243): "weather station network currently i. Standards including the height from ground and side of pole for installation are based | | | | | |
| | | | consists of 35 stations that are distributed throughout the service territory and plans to add an on existing equipment that occupy the pole as well as bucket truck accessibility. | | | | | |
| | | 1 OEIS-1-1.1 | additional four stations in 2023. In addition to Liberty's weather stations, there are dozens more Additional installation guidelines are provided in supporting materials: "Attachment RAWS and NWS weather stations within the service territory that are monitored through the Q01.i. LibertyWeather Station Installation Guide." | | | | 4 | |
| | | | MesoWest network". | | | | | |
| | | | i. Provide the installation and equipment standard that all Liberty weather stations are installed iii. 2020: 10; 2021: 29; 2022: 29. | | | | Date Designed OFIC D MAND 2022 LLL 001 Liberty | |
| EIS | 1 OEIS-P-WMP_2023-LU-001 | | to, including height from ground, direction of cross-arm, and which side of the pole/tower they iv. Refer to supporting materials: "Attachment Q01.ivLIB-Parts-Lifespan-Warranty." | Nathan Poon | 6/7/2023 | 6/12/2023 6/12/2023 | Data Request OEIS-P-WMP_2023-LU-001_Liberty_ 3 Response_07122023.pdf (libertyutilities.com) | 8 Situational Awareness & Forecasting (8.3) 8 |
| | | | Q02. Regarding Fuel Moisture Sampling: Response to Q02.: | | | | | |
| | | 2 OEIS-1-1.2 | a. Liberty states in section 8.3.2.1 of its WMP (p. 243): "In 2022, fuel moisture sampling was i. Refer to: https://fuelmoisture.com | | | | | |
| | | | 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, • Sagebrush at Meyers and Topaz (CA) | | | | Data Request OEIS-P-WMP_2023-LU-001_Liberty_ | |
| EIS | 1 OEIS-P-WMP_2023-LU-001 | | including any sites used that are being collected by other entities (CAL FIRE_LISES_BLM_etc.) • Manzanita at Ward Creek and Burton Creek (CA) | Nathan Poon | 6/7/2023 | 6/12/2023 6/12/2023 | Response_07122023.pdf (libertyutilities.com) | 8 Situational Awareness & Forecasting (8.3) |
| | | | Q03. Regarding Expulsion Fuse Replacements: a. On page 167 of Liberty's 2023 WMP, Liberty states: a. | | | | | |
| | | | "At the end of 2022, Liberty became aware that one of the current-limiting fuse options on the i. Liberty experienced four documented failures. | | | | | |
| | | | market was experiencing failures in the field. Liberty halted expulsion fuse replacements ii. Liberty has experienced no ignitions associated with these fuses. | | | | | |
| | | | because these current-limiting fuses failed to provide ignition risk reduction." b. i. Provide the number of failures Liberty experienced with this current-limiting fuse. ii. Provide i. The language quoted in this question was incorrectly stated in Liberty's 2023 WMP. The | | | | | |
| | | 3 OEIS-1-1.3 | the number of ignitions associated with this current-limiting fuse that Liberty has experienced, words "continuously checked" were an error and should have been "continuity-checked." | | | | | |
| | | | broken down by year, if applicable. ii. Liberty plans to replace the fuses with ELF non-expulsion fuses. iii. | | | | | |
| | | | 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 2019 | | | | | |
| | | | that were installed needed to be continuously checked to confirm they did not have any air gaps 2020 | | | | Data Request OEIS-P-WMP_2023-LU-001_Liberty | |
| 5 | 1 OEIS-P-WMP_2023-LU-001 | | that would load to excessive heat huildup " 2021 Q04. Regarding QA/QC for Asset Inspections: Response to Q04.: | Nathan Poon | 6/7/2023 | 6/12/2023 6/12/2023 | 3 Response_07122023.pdf (libertyutilities.com) | 8 Grid Design, operations, and maintenance (8.1) |
| | | | a. On page 182 of Liberty's 2023 WMP, Liberty states: "Current pass rates and pass rate targets a. | | | | | |
| | | 4 OEIS-1-1.4 | are not currently available. Pass rates and targets will be established and implemented for use during its 2023 QA/QC of inspections." 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 | | | | | |
| | | | during its 2023 QA/QC of inspections." to determine the appropriate metrics and scoring criteria to measure QA/QC program i. Has Liberty established these pass rates? If so, provide pass rates broken down by inspection | | | | | |
| c l | 1 OEIS-P-WMP_2023-LU-001 | | type as applicable. If not, provide Liberty's expected timeline for establishment, and describe 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) | 8 Grid Design, operations, and maintenance (8.1) |
| 5 | 1 0EI3-F-WINF_2023-L0-001 | | Q05. Regarding Open Work Orders: Response to Q05.: | | 0/7/2023 | 0/12/2023 0/12/2023 | | |
| | | | a. In Table 8-11 of Liberty's 2023 WMP, Liberty shows a total of 390 overdue work orders in HFTD a. | | | | | |
| | | 5 OEIS-1-1.5 | 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. | | | | | |
| | | | its outstanding Level 2 repairs in 2023 and plans to bring on additional contract resources | 5 | | | Data Request OEIS-P-WMP_2023-LU-001_Liberty_ | |
| ; | 1 OEIS-P-WMP_2023-LU-001 | | 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 | Response_07122023.pdf (libertyutilities.com) | 8 Grid Design, operations, and maintenance (8.1) |
| | | | 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 a. Refer to supporting materials: "Attachment Q06.a. and Q06.fLiberty Fast Trip Data." | | | | | |
| | | | impact on system reliability." What, if any, reliability impacts has Liberty observed from use of b. Liberty is planning to implement sensitive relay profile (SRP) settings that are designed | | | | | |
| | | 6 OEIS-1-1.6 | fast trip settings so far? This should include data on the following: to not cause nuisance trips but will trip as needed to provide protection. Settings will be | | | | 1 | |
| | | | i. Number of outages that occurred while fast trip settings were enabled. ii. Number of customers affected by such outages. be adding fault indicators on circuits with SRP settings in order to aide in quickly locating | | | | | |
| | 1 OEIS-P-WMP_2023-LU-001 | | iii. Duration of outages that occurred while fast trip settings were enabled. faults and restoring power. | Nathan Poon | 6/7/2023 | 6/12/2023 6/12/2023 | Data Request OEIS-P-WMP_2023-LU-001_Liberty 3 Response 07122023.pdf (libertyutilities.com) | 8 Grid Design, operations, and maintenance (8.1) |
| | | | Q07. AlertWildfire Cameras Sponsorship: Response to Q07.: | | 0,7,2020 | 0, 12, 2020 0, 12, 2020 | | |
| | | | a. In Liberty's 2023 WMP (pp. 265-266), Liberty states it intends to sponsor and support eight HD a. | | | | | |
| | | | Cameras within its territory in 2023. Liberty stated it is finalizing the partnership for the eight cameras prior the fire season in both its 2021 (p. 83) and 2022 (p. 107) WMP submissions. | | | | | |
| | | 7 OEIS-1-1.7 | i. Provide an overview of the process involved in adopting/partnering/sponsoring of these eight other existing cameras within Liberty's service territory. The process has included | | | | | |
| | | | cameras. discussions with AlertWildfire regarding the AlertWildfire annual operations services, | | | | | |
| | | | 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 agreement for the targeted AlertWildfire cameras. | | | | Data Request OEIS-P-WMP 2023-LU-001 Liberty | |
| S | 1 OEIS-P-WMP_2023-LU-001 | | obstacles that has led to the postponement. ii. Liberty has experienced challenges finalizing terms in the service agreement for the | Nathan Poon | 6/7/2023 | 6/12/2023 6/12/2023 | Response_07122023.pdf (libertyutilities.com) | 8 Grid Design, operations, and maintenance (8.1) |
| | | | a. Liberty describes a back-up power program in Section 2.1.3 of its Plan to Support Populations a. with Access and Functional Needs During PSPS. i. Liberty proposed a behind-the-meter battery program for medical baseline customers ir | | | | | |
| | | | i. What type of battery back-up service does Liberty provide to medical baseline customers? its Customer Resiliency Program application (A.22-02-008). Cal Advocates opposed the | | | | | |
| | | | ii. In 2021 and 2022, how many customers participated in this back-up power program? How program, and the proposal was dropped in a settlement agreement submitted to the | | | | | |
| | | 1 | many customers does Liberty project to participate in the program in 2023, 2024, and 2025? CPUC in that proceeding. Liberty is currently reevaluating options for providing back-up service to its medical baseline customers. | | | | | |
| | | 1 | ii. Liberty did not have a battery back-up service for medical baseline customers in 2021 | | | | | |
| | | | and 2022. Liberty does not have customer projections for a battery back-up service for | | | | | |
| | | | medical baseline customers in 2023, 2024 and 2025. | | | | Data Request OEIS-P-WMP 2023-LU-002 Liberty | |
| 5 | 2 OEIS-P-WMP_2023-LU-002 | OEIS-2-2.1 | | Nathan Poon | 6/18/2023 | 6/21/2023 6/21/2023 | 3 Response_07212023.pdf (libertyutilities.com) | N/A AFN Plan |
| | | | a. Has Liberty performed a cost-benefit analysis of its annual LiDAR inspections? a. | | | | | |
| | | 2 | i. If so, provide a brief discussion of the results of that cost-benefit analysis. b. Has Liberty performed any type of effectiveness study or studies as it relates to its LiDAR when the program was first implemented. The results of that analysis showed LiDAR | | | | | |
| | | | inspections, including, but not limited to, the effectiveness of LiDAR to accurately calculate inspections provide a lower cost per mile for performing inspections than that of ground- | | | | Data Request OEIS-P-WMP_2023-LU-002_Liberty | |
| | 2 OEIS-P-WMP_2023-LU-002 | OEIS-2-2.2 | a. In Section 6.6.1 (page 101) of its WMP, Liberty states that independent review is not a. | Nathan Poon | 6/18/2023 | 6/21/2023 6/21/2023 | 3 Response_07212023.pdf (libertyutilities.com) | N/A N/A |
| | | | applicable due to being in the early stages of implementing and using a new wildfire risk model. i. Liberty expects the independent review process to be inclusive of an assortment of | | | | | |
| | | | i. Once Liberty has fully implemented its wildfire model, what does Liberty expect the SMEs in the fields of wildfire, terrain, and statistics. | | | | | |
| | | 3 | independent review process for its wildfire risk modeling, and the data collection and generation of its wildfire risk modeling? | | | | | |
| | | | ii. What elements of Liberty's wildfire risk modeling does it expect will require independent | | | | Data Request OEIS-P-WMP_2023-LU-002_Liberty_ | |
| | 2 OEIS-P-WMP_2023-LU-002 | OEIS-2-2.3 | review (e.g., model integration, input data, review triggers)? | Nathan Poon | 6/18/2023 | 6/21/2023 6/21/2023 | 3 Response 07212023.pdf (libertyutilities.com) | 6 Risk Methodology and Assessment (6.6) |
| | | | a. Regarding Section 6.1.1, Independent Review and Section 6.6.2, Model Controls, Design, and Review; what parts of Liberty's risk modeling capabilities will remain "in-house" after the scenarios, develop model characteristics, and gain tactical insights from the risk modeling | | | | | |
| | | 4 | Technosylva model is fully implemented? i. Technosylva's analytics will be inputs to the risk-based decision-making frameworks that | | | | Data Request OEIS-P-WMP_2023-LU-002_Liberty_ | |
| | 2 OEIS-P-WMP_2023-LU-002 | OEIS-2-2.4 | i. How are Technosylva's analytics used to make risk mitigation decisions. Liberty is developing in conjunction with Direxyon. The frameworks are under | Nathan Poon | 6/18/2023 | 6/21/2023 6/21/2023 | Response_07212023.pdf (libertyutilities.com) | 6 Risk Methodology and Assessment (6.1) |
| | | | a. Does Liberty plan on replacing installed, non-exempt lightning/surge arrestors with CALFIRE exempt lightning/surge arrestors? If so, provide a timeline for the project and yearly received sample materials and Liberty's Standards Committee plans to evaluate and | | | | | |
| | | | replacement targets. | | | | | |
| | | 1 | currently no timelines or yearly replacement targets set. | | | | | |
| | | | | Nathan Daar | 7/27/2022 | 0/1/2022 | Data Request OEIS-P-WMP_2023-LU-003_Liberty_ | |
| | 3 OEIS-P-WMP_2023-LU-003 | OEIS-3-3.1 | a. On page 55 of its WMP, Liberty states it has not conducted a wildfire risk assessment using a. | Nathan Poon | 7/27/2023 | 8/1/2023 8/1/2023 | 3 <u>Response_08012023.pdf (libertyutilities.com)</u> | |
| | | | the 85th percentile consequence calculation. i. Liberty expects to complete the wildfire risk assessment using the 85th percentile | | | | | |
| | | 2 | i. Provide Liberty's expected timeline for completion of this calculation, including an explanation consequence calculation prior to the 2024 WMP Update. | | | | | |
| | | _ | of any factors contributing to potential delays in calculating this risk score, if applicable. | | | | Data Request OEIS R WIMR 2022 LLI 002 Liberty | |
| | | OEIS-3-3.2 | | Nathan Poon | 7/27/2023 | 8/1/2023 8/1/2023 | Data Request OEIS-P-WMP_2023-LU-003_Liberty_ 3 Response_08012023.pdf (libertyutilities.com) | 6 Risk Methodology and Assessment |
| | 3 OEIS-P-WMP 2023-LU-003 | | a. On page 36 of its WMP, Table 5-2. Overview of Key Liberty Electrical Equipment, Overhead a. In responding to this question, Liberty identified an error in Table 5-2 of its 2023 WMP | | ., _, _ 2020 | -, -, | | |
| | 3 OEIS-P-WMP_2023-LU-003 | | | | | | | |
| | 3 OEIS-P-WMP_2023-LU-003 | | transmission and distribution lines (circuit miles), Liberty states that it has 724.1 circuit miles in submission. The correct numbers for the Overhead transmission and distribution lines in the USTD and 24.72 singuit miles in the Ner | | | | | |
| | 3 OEIS-P-WMP_2023-LU-003 | 3 | the HFTD and 35.6 circuit miles in the Non-HFTD with a Total of 759.7 circuit miles. Table 5-2 should be 673.29 circuit miles in the HFTD and 34.72 circuit miles in the Non- | | | | | |
| | 3 OEIS-P-WMP_2023-LU-003 | 3 | | | | | Data Request OEIS-P-WMP 2023-LU-003 Liberty | |