

Liberty 2023 WMP Discovery Log

Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question	Response	Requestor	Date Received	Final Date Due	Date Sent	Links	Number of Attachments	Attachment Links	NDA Required?	WMP Section	Category	Subcategory
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	1	CalAdv-01-1.1	Please provide a copy of each WMP-related document, submission, or report you submit to the Office of Energy Infrastructure Safety (Energy Safety) in 2023 that is related to your WMP. Provide the copy to CalAdvocates within one business day of the document's submission to Energy Safety. If you have submitted the document to Energy Safety in 2023 prior to this data request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this data request. This request is limited to materials or documents that (1) are related to work plans, initiative targets, risk models, risk spend efficiency (RSE) calculations, or WMP change orders; and (2) are provided to Energy Safety to provide additional details or context concerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP).	Refer to attachment: "2023-03-06_Liberty_2023_WMP-RO" for Liberty's 2023 WMP pre-submission, as submitted to OIEs on March 6, 2023. Additionally, Liberty attempted to provide CalAdvocates with copies of its Q4 2022 Quarterly Data Report ("QDR") files on February 1, 2023. However, due to technical issues with the CPUC Kiteworks platform, Liberty was not able to provide copies of these files until February 9, 2023.	Aaron Louie	2/24/2023	N/A	3/8/2023	<a href="#">CalAdvocates-Liberty-2023WMP-01_Liberty-Response-03082023.pdf</a> ( <a href="#">libertyutilities.com</a> )	1			WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	2	CalAdv-01-1.2	Please provide a copy of your WMP pre-submission within two business days of its submission to Energy Safety.	Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	N/A	3/8/2023	<a href="#">CalAdvocates-Liberty-2023WMP-01_Liberty-Response-03082023.pdf</a> ( <a href="#">libertyutilities.com</a> )	1			WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	3	CalAdv-01-1.3	Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but not limited to all PDFs, spatial data files, non-spatial data files, and confidential attachments) on the same business day that the document is sent to Energy Safety.	Liberty attempted to provide CalAdvocates with copies of its Q4 2022 QDR files on February 1, 2023. However, due to technical issues with the CPUC Kiteworks platform, Liberty was not able to provide copies of these files until February 9, 2023.	Aaron Louie	2/24/2023	N/A	3/8/2023	<a href="#">CalAdvocates-Liberty-2023WMP-01_Liberty-Response-03082023.pdf</a> ( <a href="#">libertyutilities.com</a> )				WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	4	CalAdv-01-1.4	Provide a copy of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the issuer of the discovery request. This includes: a) Confidential responses to WMP discovery requests issued by Energy Safety; b) Confidential responses to WMP discovery requests issued by other entities.	Liberty will provide CalAdvocates with copies of responses to 2023 WMP discovery requests made by Energy Safety and other entities.	Aaron Louie	2/24/2023	N/A	3/8/2023	<a href="#">CalAdvocates-Liberty-2023WMP-01_Liberty-Response-03082023.pdf</a> ( <a href="#">libertyutilities.com</a> )				WMP Pre-Submission	Administrative	N/A
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	1	CalAdv-02-2.1	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that were completed since January 1, 2022, and that examined any programs, initiatives, or strategies described in your 2022 WMP Update.	For Vegetation Management programs, Liberty performs a post-work documentation review, or desktop review, of 100% of vegetation management invoices in order to confirm accuracy. If satisfactory, the invoices are approved in Liberty's work management system. If not satisfactory, the invoice and supporting documents are returned to the contractor for correction. The following file related to Liberty's Post-Work Verification Procedure ("PWVP") desktop review is included in the Supporting Materials email for this data request response sent to CalAdvocates through the CPUC Kiteworks system: "2022 Liberty Internal Desktop Invoice Audit Tracker." Additionally, Liberty system arborists perform post-work field verifications to confirm adherence to work specifications. This includes a review to determine whether (1) adequate clearances were achieved, (2) slash and debris removal was satisfactory, (3) the inventory of the work is accurate, and (4) pruning was completed per ANSI standards. Work that is determined to be unsatisfactory is reported to the contractor to be corrected. Liberty provided additional information regarding its vegetation management QA/QC procedures in Section 8.2.5 of its 2023 WMP pre-submission. Liberty is in the process of collecting QA/QC materials completed as part of its asset inspections QA/QC program in 2022. Liberty plans to provide this information to CalAdvocates by March 17, 2023.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	<a href="#">CalAdvocates-Liberty-2023WMP-02_Liberty-Response-03102023.pdf</a> ( <a href="#">libertyutilities.com</a> )	6			8	Grid Design, operations, and maintenance (8.1), Vegetation Management (8.2)	8.1.6, 8.2.5
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	2	CalAdv-02-2.2	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by external entities that were completed since January 1, 2022, and that examined any programs, initiatives, or strategies described in your 2022 WMP Update. External entities include, but are not limited to, consultants, contractors, auditors, court-appointed monitors, and Independent Evaluators.	Refer to the following vegetation management files and folders in the Supporting Materials email for this data request response sent to CalAdvocates through the CPUC Kiteworks system: "2022_VM_OC_Pass_Results_Report.xlsx", "TAM700_LIDAR_Work_OC_Corrective_Action.xlsx", "QC of Completed Work folder", "QC of Inspections folder. Liberty is in the process of collecting QA/QC materials completed as part of its asset inspections QA/QC program in 2022. Liberty plans to provide this information to CalAdvocates by March 17, 2023.", "QC of Pole Clearing folder", "Dead tree audit 7 22 folder".	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	<a href="#">CalAdvocates-Liberty-2023WMP-02_Liberty-Response-03102023.pdf</a> ( <a href="#">libertyutilities.com</a> )				8	Grid Design, operations, and maintenance (8.1), Vegetation Management (8.2)	8.1.6, 8.2.5
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	3	CalAdv-02-2.3	Provide an Excel table of all defects in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns: a) Associated circuit name b) Defect type c) Description of defect d) 2022 WMP initiative (from your 2022 WMP update) associated with defect e) Date that the defect was identified f) Date that the defect was corrected g) If the defect has not yet been corrected as of the issuance date of this data request, a brief explanation. h) Priority level of corresponding corrective tag i) Geographic latitude of defect in decimal degrees, truncated to seven decimal places j) Geographic longitude of defect in decimal degrees, truncated to seven decimal places.	Liberty did not receive any Notices of Defects from Energy Safety in 2022.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	<a href="#">CalAdvocates-Liberty-2023WMP-02_Liberty-Response-03102023.pdf</a> ( <a href="#">libertyutilities.com</a> )				12	Notices of Violation and Defect	N/A
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	4	CalAdv-02-2.4	Provide an Excel table of all violations in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns: a) Associated circuit name b) Violation type c) Description of violation d) 2022 WMP initiative (from your 2022 WMP update) associated with violation e) Date that the violation was identified f) Date that the violation was corrected g) If the violation has not yet been corrected as of the issuance date of this data request, a brief explanation. h) Priority level of corresponding corrective tag i) Geographic latitude of violation in decimal degrees, truncated to seven decimal places j) Geographic longitude of violation in decimal degrees, truncated to seven decimal places.	Liberty did not receive any Notices of Violations from Energy Safety in 2022.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	<a href="#">CalAdvocates-Liberty-2023WMP-02_Liberty-Response-03102023.pdf</a> ( <a href="#">libertyutilities.com</a> )				12	Notices of Violation and Defect	N/A
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	1	CalAdv-03-3.1	Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns: a) Circuit name b) Circuit ID number c) Total circuit miles d) Circuit miles in Non-HFTD Areas e) Circuit miles in Other HFTD f) Circuit miles in HFTD Tier 2 g) Circuit miles in HFTD Tier 3 h) Circuit voltage i) Circuit SAIDI (System Average Interruption Duration Index) for 2021 j) Circuit SAIDI (System Average Interruption Duration Index) for 2022 k) Circuit SAIFI (System Average Interruption Frequency Index) for 2021 l) Circuit SAIFI (System Average Interruption Frequency Index) for 2022 m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2021 n) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022 o) Total customer-minutes of de-energization on the circuit due to PSE events in 2021 (sum of customer-minutes across all PSE events). p) Total customer-minutes of de-energization on the circuit due to PSE events in 2022 (sum of customer-minutes across all PSE events). q) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. r) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2022. s) Number of trees that were worked on for EVM in Non-HFTD in 2021. t) Number of trees that were worked on for EVM in Non-HFTD in 2022. u) Number of trees that were worked on for EVM in Other HFTD in 2021. v) Number of trees that were worked on for EVM in Other HFTD in 2022. w) Number of trees that were worked on for EVM in HFTD Tier 2 in 2021. x) Number of trees that were worked on for EVM in HFTD Tier 2 in 2022. y) Number of trees that were worked on for EVM in HFTD Tier 3 in 2021. z) Number of trees that were worked on for EVM in HFTD Tier 3 in 2022.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q1 - Distribution.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	<a href="#">CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292023.pdf</a> ( <a href="#">libertyutilities.com</a> )	1			5, 6	Electrical Infrastructure	5.2, 6.4.2
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	2	CalAdv-03-3.2	Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns: a) Circuit name b) Circuit ID number c) Total circuit miles d) Circuit miles in Non-HFTD Areas e) Circuit miles in Other HFTD f) Circuit miles in HFTD Tier 2 g) Circuit miles in HFTD Tier 3 h) Circuit voltage i) Total customer-minutes of de-energization on the circuit due to PSE events in 2021 (sum of customer-minutes across all PSE events). j) Total customer-minutes of de-energization on the circuit due to PSE events in 2022 (sum of customer-minutes across all PSE events). k) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. l) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2022. m) Number of support structures replaced in Non-HFTD in 2021. n) Number of support structures replaced in Non-HFTD in 2022. o) Number of support structures replaced in Other HFTD in 2021. p) Number of support structures replaced in Other HFTD in 2022. q) Number of support structures replaced in HFTD Tier 2 in 2021. r) Number of support structures replaced in HFTD Tier 2 in 2022. s) Number of support structures replaced in HFTD Tier 3 in 2021. t) Number of support structures replaced in HFTD Tier 3 in 2022. u) Miles of LIDAR inspection in Non-HFTD in 2021. v) Miles of LIDAR inspection in Non-HFTD in 2022. w) Miles of LIDAR inspection in Other HFTD in 2021. x) Miles of LIDAR inspection in Other HFTD in 2022.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q2 - Transmission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	<a href="#">CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292023.pdf</a> ( <a href="#">libertyutilities.com</a> )	1			5, 6	Electrical Infrastructure	5.2, 6.4.3
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	3	CalAdv-03-3.3	Provide an Excel table of all transmission circuits existing as of January 1, 2022, that were removed or decommissioned in 2022, either partially or entirely (as rows). This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns: a) Circuit name b) Circuit ID number c) Circuit miles removed or decommissioned in Non-HFTD Areas d) Circuit miles removed or decommissioned in Other HFTD e) Circuit miles removed or decommissioned in HFTD Tier 2 f) Circuit miles removed or decommissioned in HFTD Tier 3 g) Reason(s) for removal or decommissioning.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q3 - Distribution Removals.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	<a href="#">CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292023.pdf</a> ( <a href="#">libertyutilities.com</a> )	1			8	Line Removal	8.1.2.9
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	4	CalAdv-03-3.4	Provide an Excel table of all transmission circuits existing as of January 1, 2022, that were removed or decommissioned in 2022, either partially or entirely (as rows). This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns: a) Circuit name b) Circuit ID number c) Circuit miles removed or decommissioned in Non-HFTD Areas d) Circuit miles removed or decommissioned in Other HFTD e) Circuit miles removed or decommissioned in HFTD Tier 2 f) Circuit miles removed or decommissioned in HFTD Tier 3 g) Reason(s) for removal or decommissioning.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q4 - Transmission Removals.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	<a href="#">CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292023.pdf</a> ( <a href="#">libertyutilities.com</a> )	1			8	Line removal	8.1.2.9

				For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced where you performed work in 2022. a) Vegetation management (VM) b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2022. Work performed in 2022 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring	N/A		
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	5	CalAdv-03-3.5	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced how work in 2022 was sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2022. Work performed in 2022 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring	N/A	
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	6	CalAdv-03-3.6	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2023. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring	N/A	
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	7	CalAdv-03-3.7	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2023. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring	N/A	
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	8	CalAdv-03-3.8	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2023 will be sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring	N/A	
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	9	CalAdv-03-3.9	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2024. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring	N/A	
CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	10	CalAdv-03-3.10	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2024 will be sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty Response_03292023.pdf (libertyutilities.com)	6	Risk Scoring	N/A	
CalAdvocates	4	CalAdvocates-Liberty-2023WMP-04	1	CalAdv-04-4.1	For each WMP initiative for which you forecast capital expenditures in 2023 to be at least two times actual capital expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 1.	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty Response_03312023.pdf (libertyutilities.com)	1	WMP Financials	N/A	
CalAdvocates	4	CalAdvocates-Liberty-2023WMP-04	2	CalAdv-04-4.2	For each WMP initiative for which you forecast capital expenditures in 2024 to be at least two times actual capital expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 2.	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty Response_03312023.pdf (libertyutilities.com)	1	WMP Financials	N/A	
CalAdvocates	4	CalAdvocates-Liberty-2023WMP-04	3	CalAdv-04-4.3	For each WMP initiative for which you forecast operating expenditures in 2023 to be at least two times actual operating expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 3.	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty Response_03312023.pdf (libertyutilities.com)	1	WMP Financials	N/A	
CalAdvocates	4	CalAdvocates-Liberty-2023WMP-04	4	CalAdv-04-4.4	For each WMP initiative for which you forecast operating expenditures in 2024 to be at least two times actual operating expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 4.	Aaron Louie	2/24/2023	3/24/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-04_Liberty Response_04102023.pdf (libertyutilities.com)	1	WMP Financials	N/A	
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	1	CalAdv-05-5.1	a) As of January 1, 2022, have you identified transportation corridors within your service territory where falling or falling lines or poles could currently limit egress and/or ingress during an emergency? b) If the answer to part (a) is yes, please describe how you identify such transportation corridors. c) If available, please provide a geospatial data file that contains all current identified transportation corridors with ingress and egress hazards.	a) No. b) N/A c) N/A	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	6	N/A	N/A	
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	2	CalAdv-05-5.2	Provide an Excel table of all distribution circuit-segments that traverse HFTD areas (i.e. the segment has greater than zero circuit-miles in HFTD) existing as of January 1, 2023. The Excel table should list each such circuit-segment as a row and include the following information in separate columns. For items (n) and (o), please include all relevant risk scores. For example, include vegetation risk score, conductor risk score, and any other driver-specific risk scores you have developed. Please insert additional columns as needed to accommodate this. a) Name or ID number of each circuit segment b) Circuit name for the circuit that each segment is part of c) Circuit ID for the circuit that each segment is part of d) Nominal voltage e) Total circuit-miles on the circuit-segment f) Overhead circuit-miles on the circuit-segment in non-HFTD Areas g) Overhead circuit-miles on the circuit-segment in HFTD Tier 2 h) Overhead circuit-miles on the circuit-segment in HFTD Tier 3 i) Underground circuit-miles on the circuit-segment in non-HFTD Areas j) Underground circuit-miles on the circuit-segment in HFTD Tier 2 k) Underground circuit-miles on the circuit-segment in HFTD Tier 3 l) Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing m) Consequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing n) Total wildfire risk score(s) for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Insert additional columns if needed. o) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you used for your 2022 WMP filing p) Probability of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing q) Consequence of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 2,"	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	6	N/A	N/A	
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	3	CalAdv-05-5.3	Provide a geodatabase file containing the outputs from your current wildfire risk model (i.e., the model you are using for your 2023-2025 WMP filing) at the circuit-segment level. This data should be equivalent to the previous question, but in GIS format.) Please provide, as line features, the most recent spatial data for all circuit segments for which your current risk model calculates circuit-segment-level expected risk (i.e., probability of ignition multiplied by the consequence of ignition). Include the following attributes for each circuit segment: a) Items (a) through (q) of the previous question b) Items (r) through (s) of the previous question.	Liberty does not have a geodatabase file containing the outputs from its wildfire risk model used for the 2023-2025 WMP pre-submission at the circuit-segment level.	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	6	N/A	N/A	
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	4	CalAdv-05-5.4	Please fill out the attached spreadsheet, CalAdvocates-Liberty-2023WMP-05_Attachment Tab 1, requesting information regarding your asset inspections in 2022. In response to Data Request CalAdvocates-Liberty-2022WMP-06, Question 7, March 24, 2022, Liberty stated, "Liberty's QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 2022 after Quarter 1 and Quarter 2 detailed inspections are completed." a) Did Liberty implement its QA/QC processes for asset inspections in the second half of 2022 as referenced in the quote above? b) Please summarize the results of Liberty's asset inspection QA/QC reviews in 2022. c) Did Liberty's asset inspection QA/QC reviews in 2022 lead to any corrective actions or improvements, such as performing re-inspections of certain assets, revising inspection protocols, or changing training for inspectors? d) If the answer to part (c) is yes, please describe the actions that Liberty is taking as a result of its asset inspection QA/QC reviews. e) If the answer to part (c) is no, please explain why not.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 4," a) Yes b) As part of its QA/QC process for 2022, Liberty assigned a third-party contractor to re-inspect 0.5% of its 2022 detailed inspections, equating to 27 re-inspections. Of these, 24 were completed and three locations were inaccessible at the time of re-inspection due to snow, equating to 0.44% re-inspected. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 5 and 6." c) No. The QA/QC reviews showed that there are some inconsistencies among inspectors, but the significant issues were captured by both inspections. d) None. e) Minor inconsistencies among inspectors are to be expected. Since major issues were captured with both inspections, no action is being taken at this time.	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	1	8	Grid Design, operations, and maintenance (B.1)	8.1.6
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	5	CalAdv-05-5.5	In response to Data Request CalAdvocates-Liberty-2022WMP-06, Question 7, March 24, 2022, Liberty stated "Liberty's QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 2022 after Quarter 1 and Quarter 2 detailed inspections are completed." The following questions refer to the QA/QC processes for asset inspections that Liberty implemented in Quarter 3 and Quarter 4 of 2022: a) Please provide a sample of 5 completed "Appendix A - Program Manager Quarterly Review Acknowledgment" forms. b) Please provide a sample of 5 completed "Appendix B - Senior Manager Annual Review Acknowledgment" forms. c) Please provide a sample of 5 completed "Appendix C - Third Party Inspection" forms that were completed by third party contractors.	a) Liberty completed one Program Manager Review Acknowledgment form for 2022 asset inspection QA/QC activities. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 6," b) Liberty completed one Senior Manager Annual Review Acknowledgment form for 2022 asset inspection QA/QC activities. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 6," c) Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 5 and 6." This file captures the information from the third party QA/QC inspections completed in 2022.	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	1	8	Grid Design, operations, and maintenance (B.1)	8.1.6
CalAdvocates	5	CalAdvocates-Liberty-2023WMP-05	6	CalAdv-05-5.6			Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty Response_04102023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (B.1)	8.1.6	





	Green Power Institute	1	GPI-Liberty-2023WMP-01	1	GPI-01-1.1	Please provide Liberty's Pre-submission 2023-2025 WMP Base Plan filed on March 6, 2023, with the OES per the 2023 WMP Guidelines and Schedule document, including all attachments and associated supporting documents required for the Pre-submission 2023-2025 WMP Base Plan filing.	Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP pre-submission.	Gregg Morris	3/6/2023	3/9/2023	3/8/2023	GPI_Liberty_2023WMP_01_Liberty_Response_03082023.pdf (libertyutilities.com)	1			WMP Pre-Submission	Administrative	N/A				
	OEIS	1	OEIS-P-WMP_2023-LU-001	1	OEIS-1-1.1	Q01: Regarding Weather Station Standards and Locations: a. Liberty states in section 8.3.2.1 of its WMP (p. 243): "...weather station network currently consists of 35 stations that are distributed throughout the service territory and plans to add an additional four stations in 2023. In addition to Liberty's weather stations, there are dozens more RAVS and NWS weather stations within the service territory that are monitored through the MesWest network". i. Provide the installation and equipment standard that all Liberty weather stations are installed to, including height from ground, direction of cross-arm, and which side of the pole/tower they are installed on. Q02: Regarding Fuel Moisture Sampling: a. Liberty states in section 8.3.2.1 of its WMP (p. 243): "In 2022, fuel moisture sampling was conducted on a weekly basis and will continue during the 2023 fire season." i. Provide a map of the Live Fuel Moisture (LFM) and Dead Fuel Moisture (DFM) sampling sites, including any sites used that are being collected by other entities (CAL FIRE, LSES, RJM, etc.). Q03: Regarding Expulsion Fuse Replacements: a. On page 167 of Liberty's 2023 WMP, Liberty states: "At the end of 2022, Liberty became aware that one of the current-limiting fuse options on the market was experiencing failures in the field. Liberty halted expulsion fuse replacements because these current-limiting fuses failed to provide ignition risk reduction." i. Provide the number of failures Liberty experienced with this current-limiting fuse. ii. Provide the number of ignitions associated with this current-limiting fuse that Liberty has experienced, broken down by year, if applicable. b. On page 167 of Liberty's 2023 WMP, Liberty states: "The current-limiting fuse vendor suggested that no more fuses should be installed, and any that were installed needed to be continuously checked to confirm they did not have any air gaps that would create a propagation path for a fire." Q04: Regarding QA/QC for Asset Inspections: a. On page 182 of Liberty's 2023 WMP, Liberty states: "Current pass rates and pass rate targets are not currently available. Pass rates and targets will be established and implemented for use during its 2023 QA/QC of inspections." i. Has Liberty established these pass rates? If so, provide pass rates broken down by inspection type as applicable. If not, provide Liberty's expected timeline for establishment, and describe type as applicable. Q05: Regarding Open Work Orders: a. In Table 8-11 of Liberty's 2023 WMP, Liberty shows a total of 390 overdue work orders in HFD Tier 2 or 3, with 285 work orders 181+ days overdue. i. Provide details as to why these work orders are overdue, including trends on cause for delay.	Response to Q01: i. Standards including the height from ground and side of pole for installation are based on existing equipment that occupy the pole as well as bucket truck accessibility. Additional installation guidelines are provided in supporting materials: "Attachment Q01_LibertyWeather Station Installation Guide." ii. None. iii. 2020: 10; 2021: 29; 2022: 29. iv. Refer to supporting materials: "Attachment Q01.iv_LIB-Parts-Lifespan-Warranty." v. None. vi. None. Response to Q02: i. Refer to: https://fuelmoisture.com ii. Vegetation types: • Sagebrush at Meyers and Topaz (CA) • Mesquite at West Creek and Ruston Creek (CA) • None. Response to Q03: a. i. Liberty experienced four documented failures. ii. Liberty has experienced no ignitions associated with these fuses. b. i. The language quoted in this question was incorrectly stated in Liberty's 2023 WMP. The words "continuously checked" were an error and should have been "continuity-checked". ii. Liberty plans to replace the fuses with ELF non-expulsion fuses. iii. 2018 2019 2020 2021 2022 2023 Response to Q04: a. i. No. Liberty expects it to take two years of program implementation and data collection to determine the appropriate metrics and scoring criteria to measure QA/QC program performance, including establishing an Acceptable Quality Level ("AQL") and Conformance Rate ("CR"). ii. Liberty expects it to take two years of program implementation and data collection to determine the appropriate metrics and scoring criteria to measure QA/QC program performance, including establishing an Acceptable Quality Level ("AQL") and Conformance Rate ("CR"). Response to Q05: i. The main cause includes limited resources being diverted to respond to storm events instead of being directed toward GO 95 infractions. Liberty plans to continue to address its outstanding Level 2 repairs in 2023 and plans to bring on additional contract resources in Q3 and Q4 of 2023 in order to stay in compliance with GO timelines.	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)	4			8 Situational Awareness & Forecasting (8.3)	8.3.2					
	OEIS	1	OEIS-P-WMP_2023-LU-001	2	OEIS-1-1.2	Q06: Regarding Fast Trip Settings: a. On page 185 of Liberty's 2023 WMP, Liberty states "the use of fast trip settings will have an impact on system reliability." What, if any, reliability impacts has Liberty observed from use of fast trip settings so far? This should include but not be limited to the following: i. Number of outages that occurred while fast trip settings were enabled. ii. Number of customers affected by such outages. iii. Duration of outages that occurred while fast trip settings were enabled.	Response to Q06: a. Refer to supporting materials: "Attachment Q06.a. and Q06.f. Liberty Fast Trip Data." b. Liberty is planning to implement sensitive relay profile (SRP) settings that are designed to not cause nuisance trips but will trip as needed to provide protection. Settings will be staged to minimize portions of circuits that will be de-energized. In addition, Liberty will be adding fault indicators on circuits with SRP settings in order to aid in quickly locating faults and restoring power.	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)	1			8 Grid Design, operations, and maintenance (8.1)	8.1.2					
	OEIS	1	OEIS-P-WMP_2023-LU-001	3	OEIS-1-1.3	Q07: Alert/Wildfire Camera Sponsorship: a. In Liberty's 2023 WMP (pp. 265-266), Liberty states it intends to sponsor and support eight HD Cameras within its territory in 2023. Liberty stated it is finalizing the partnership for the eight cameras prior to the fire season in both its 2021 (p. 83) and 2022 (p. 107) WMP submissions. i. Provide an overview of the process involved in adopting/partnering/sponsoring of these eight cameras. ii. Provide an explanation behind the delays in achieving the previous targeted goals for partnering/adopting/sponsoring of the eight HD Cameras, including specific challenges or obstacles that has led to the postponement.	Response to Q07: a. i. Liberty has partnered with the University of Nevada, Reno and the Alert/Wildfire camera network to bring eight cameras to the Lake Tahoe Basin as well as the ability to access other existing cameras within Liberty's service territory. The process has included discussions with Alert/Wildfire regarding the Alert/Wildfire annual operations services, scope of work, pricing and locations. The process has also included negotiating a service agreement for the targeted Alert/Wildfire cameras. ii. Liberty has experienced challenges finalizing terms in the service agreement for the	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)	1			8 Grid Design, operations, and maintenance (8.1)	8.1.2					
	OEIS	1	OEIS-P-WMP_2023-LU-001	4	OEIS-1-1.4	Q08: Regarding Back-up Power Program: a. Liberty describes a back-up power program in Section 2.1.3 of its Plan to Support Populations with Access and Functional Needs During PSPS. i. What type of battery back-up service does Liberty provide to medical baseline customers? ii. In 2021 and 2022, how many customers participated in this back-up power program? How many customers does Liberty project to participate in the program in 2023, 2024, and 2025?	Response to Q08: a. i. Liberty proposed a behind-the-meter battery program for medical baseline customers in its Customer Resiliency Program application (A.22-02-008). Cal Advocates opposed the program, and the proposal was dropped in a settlement agreement submitted to the CPUC in that proceeding. Liberty is currently reevaluating options for providing back-up service to its medical baseline customers. 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.	Nathan Poon	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty_Response_07122023.pdf (libertyutilities.com)	1			8 Grid Design, operations, and maintenance (8.1)	8.1.2					
	OEIS	2	OEIS-P-WMP_2023-LU-002	1	OEIS-2-2.1	a. Has Liberty performed a cost-benefit analysis of its annual LIDAR inspections? 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 inspections, including, but not limited to, the effectiveness of LIDAR to accurately calculate clearance distances and identify potential safety hazards?	Response to Q09: a. i. Yes, Liberty completed a cost-benefit analysis of its annual LIDAR inspections after 2020 when the program was first implemented. The results of that analysis showed LIDAR inspections provide a lower cost per mile for performing inspections than that of ground-based inspections. Additional analysis was also conducted to determine the value of ground-based inspections. ii. The independent review process should encompass the data inputs and the statistical framework/model.	Nathan Poon	6/18/2023	6/21/2023	6/21/2023	Data Request OEIS-P-WMP_2023-LU-002_Liberty_Response_07122023.pdf (libertyutilities.com)				N/A	AFN Plan	N/A				
	OEIS	2	OEIS-P-WMP_2023-LU-002	2	OEIS-2-2.2	a. In Section 6.6.1 (page 101) of its WMP, Liberty states that independent review is not applicable due to being in the early stages of implementing and using a new wildfire risk model. i. Once Liberty has fully implemented its wildfire model, what does Liberty expect the 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 review (e.g., model integration, input data, review triggers)?	Response to Q10: a. i. After the risk modeling framework is fully implemented, Liberty will be able to run scenarios, develop model characteristics, and gain tactical insights from the risk modeling. ii. Technology's analytics will be inputs to the risk-based decision-making frameworks that Liberty is developing in conjunction with Deyon. The frameworks are under development. b. i. Liberty has initiated its evaluation of exempt lightning/surge arresters. Liberty recently received sample materials and Liberty's Standards Committee plans to evaluate and recommend construction standards for install prior to piloting the technology. There are currently no timelines or yearly-replacement targets set.	Nathan Poon	6/18/2023	6/21/2023	6/21/2023	Data Request OEIS-P-WMP_2023-LU-002_Liberty_Response_07122023.pdf (libertyutilities.com)				N/A	N/A	N/A				
	OEIS	2	OEIS-P-WMP_2023-LU-002	3	OEIS-2-2.3	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 Technosysva model is fully implemented? i. How are Technosysva's analytics used to make risk mitigation decisions.	Response to Q11: a. i. Liberty has initiated its evaluation of exempt lightning/surge arresters. Liberty recently received sample materials and Liberty's Standards Committee plans to evaluate and recommend construction standards for install prior to piloting the technology. There are currently no timelines or yearly-replacement targets set.	Nathan Poon	6/18/2023	6/21/2023	6/21/2023	Data Request OEIS-P-WMP_2023-LU-002_Liberty_Response_07122023.pdf (libertyutilities.com)				6 Risk Methodology and Assessment (6.6)	6.6.1					
	OEIS	2	OEIS-P-WMP_2023-LU-002	4	OEIS-2-2.4	a. Does Liberty plan on replacing installed, non-exempt lightning/surge arresters with CALFIRE exempt lightning/surge arresters? If so, provide a timeline for the project and yearly replacement targets.	Response to Q12: a. i. Liberty has initiated its evaluation of exempt lightning/surge arresters. Liberty recently received sample materials and Liberty's Standards Committee plans to evaluate and recommend construction standards for install prior to piloting the technology. There are currently no timelines or yearly-replacement targets set.	Nathan Poon	6/18/2023	6/21/2023	6/21/2023	Data Request OEIS-P-WMP_2023-LU-002_Liberty_Response_07122023.pdf (libertyutilities.com)				6 Risk Methodology and Assessment (6.1)	6.1.1					
	OEIS	3	OEIS-P-WMP_2023-LU-003	1	OEIS-3-3.1	a. On page 55 of its WMP, Liberty states it has not conducted a wildfire risk assessment using the 85th percentile consequence calculation. i. Provide Liberty's expected timeline for completion of this calculation, including an explanation of any factors contributing to potential delays in calculating this risk score, if applicable.	Response to Q13: a. i. Liberty expects to complete the wildfire risk assessment using the 85th percentile consequence calculation prior to the 2024 WMP Update.	Nathan Poon	7/27/2023	8/1/2023	8/1/2023	Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08012023.pdf (libertyutilities.com)										
	OEIS	3	OEIS-P-WMP_2023-LU-003	2	OEIS-3-3.2	a. On page 36 of its WMP, Table 5-2, Overview of Key Liberty Electrical Equipment, Overhead Transmission and Distribution Lines (circuit miles), Liberty states that it has 724.1 circuit miles in the HFD and 35.6 circuit miles in the Non-HFD with a Total of 759.7 circuit miles. i. Provide Liberty's total circuit miles of Overhead Transmission Lines in the HFD and Non-HFD and Liberty's total circuit miles of Overhead Distribution Lines in the HFD and Non-HFD.	Response to Q14: a. In responding to this question, Liberty identified an error in Table 5-2 of its 2023 WMP submission. The correct numbers for the Overhead transmission and distribution lines in Table 5-2 should be 673.29 circuit miles in the HFD and 34.72 circuit miles in the Non-HFD, with a total of 708.01 circuit miles. Please refer to the table below. (See response for table)	Nathan Poon	7/27/2023	8/1/2023	8/1/2023	Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08012023.pdf (libertyutilities.com)				6 Risk Methodology and Assessment						
	OEIS	3	OEIS-P-WMP_2023-LU-003	3	OEIS-3-3.3			Nathan Poon	7/27/2023	8/1/2023	8/1/2023	Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08012023.pdf (libertyutilities.com)				5 Electrical Infrastructure (5.2)			5.2			