				Liberty 2023 WMP Discovery Log							
Last Updated: 8/17/2023 Count Party Name D	DR Set # Data Request	Question No. Ques	estion ID Question	Responses	Requestor Da	ate Received Fin	al Date Due Date Sent Links	Number of Attachements Attachment Links NDA Required	? WMP Section	n Category	Subcategory
Count runty name 5	Data nequest	questionnes	Please provide a copy of each WMP-related document, submission, or report you submit to the Office of Energy Infrastructure Safety (Energy Sa 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 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 busined 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	Refer to attachment: "2023-03-06_Liberty_2023_WMP-RO" for Liberty's 2023 WMP presub have 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, Liberty	requestor Da		N/A	1		Cutcgory	Subcutegory
CalAdvocates	1 CalAdvocates-Liberty-2023WMP-01	1 CalAdv-0	models, risk spend efficiency (RSE) calculations, or WMP change orders; and (2) are provided to Energy Safety to provide additional details or corconcerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP). -01-1.1		ron Louie	2/24/2023	CalAdvocates-Liberty-2023WMP-01_Liberty 3/8/2023 Response 03082023.pdf (libertyutilities.com)		WMP Pre- Submission	Administrative	N/A
CalAdvocates	1 CalAdvocates-Liberty-2023WMP-01	2 CalAdv-C		Pro Commence of the Commence o	ron Louie	2/24/2023	N/A CalAdvocates-Liberty-2023WMP-01 Liberty Response 03082023.pdf (libertyutilities.com)	1	WMP Pre- Submission	Administrative	N/A
			Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but n 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 Safety				N/A CalAdvocates-Liberty-2023WMP-01 Liberty		WMP Pre-		
CalAdvocates	1 CalAdvocates-Liberty-2023WMP-01	3 CalAdv-C	-01-1.3 Provide a copy of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the issue	Aaro	ron Louie	2/24/2023	3/8/2023 Response 03082023.pdf (libertyutilities.com)		Submission	Administrative	N/A
C-1A-hh	4 Callada a cata a Liberta 2022/A/A/D 04	C-IA-L-C	the discovery request. This includes: a) Confidential responses to WMP discovery requests issued by Energy Safety. b) Confidential responses to \discovery requests issued by other entities.		and Louis		N/A CalAdvocates-Liberty-2023WMP-01_Liberty 2 (9 (2023) Programs 02002023 with (liberty with liberty and programs)		WMP Pre-		21/2
CalAdvocates	1 CalAdvocates-Liberty-2023WMP-01	4 CalAdv-C	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that were completed January 1, 2022, and that examined any programs, initiatives, or strategies described in your 2022 WMP Update.		ron Louie	2/24/2023	3/8/2023 Response 03082023.pdf (libertyutilities.com)		Submission	Administrative	N/A
				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 to CalAdvocates by March 17, 2023.			CalAdvocates-Liberty-2023WMP-02 Liberty			Grid Design, operations, and maintenance (8.1).	
CalAdvocates	2 CalAdvocates-Liberty-2023WMP-02	1 CalAdv-C	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by external entities that were completed	I since Refer to the following vegetation management files and folders in the Supporting Materials	ron Louie	2/24/2023	3/10/2023 3/10/2023 Response 03102023.pdf (libertyutilities.com)		8	Vegetation Management (8.2)	8.1.6, 8.2.5
CalAdvocates	2 CalAdvocates-Liberty-2023WMP-02	2 CalAdv-0	January 1, 2022, and that examined any programs, initiatives, or strategies described in your 2022 WMP Update. External entities include, but are limited to, consultants, contractors, auditors, court-appointed monitors, and Independent Evaluators.	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	ron Louie	2/24/2023	CalAdvocates-Liberty-2023WMP-02 Liberty 3/10/2023 3/10/2023 Response 03102023.pdf (libertyutilities.com)	6	8	Grid Design, operations, and maintenance (8.1). Vegetation Management (8.2)	8.1.6, 8.2.5
curravocates	2 Call divocates Eliserty 2023WWII 02	2 Culvida C	Provide an Excel table of all defects in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following informatic separate columns. a) Associated circuit name		Ton Louic	2/24/2023	3/10/2023 Response 03102023.pdf (insertydtilities.com)			vegetation management (0.2)	0.1.0, 0.2.3
			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				CalAdvocates-Liberty-2023WMP-02 Liberty				
CalAdvocates	2 CalAdvocates-Liberty-2023WMP-02	3 CalAdv-C	-02-2.3 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 of the provided in th		ron Louie	2/24/2023	3/10/2023 3/10/2023 Response 03102023.pdf (libertyutilities.com)		12	Notices of Violation and Defect	N/A
	2 Callada a cata a Liberta 2022/MAD 02		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			2/24/2022	CalAdvocates-Liberty-2023WMP-02 Liberty			Nations of Vialation and Defeat	21/2
CalAdvocates	2 CalAdvocates-Liberty-2023WMP-02	4 CalAdv-C	-02-2.4 j) Geographic longitude of violation in decimal degrees, truncated to seven decimal places. Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that includes the following information in separate column Circuit name		ron Louie	2/24/2023	3/10/2023 3/10/2023 <u>Response 03102023.pdf (libertyutilities.com)</u>		12	Notices of Violation and Defect	N/A
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	1 CalAdv-C	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 2021 m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022 m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022 o) Total customer-minutes of de-energization on the circuit due to PSPS events in 2021 (sum of customer-minutes across all PSPS events). p) Total customer-minutes of de-energization on the circuit due to PSPS events in 2021 (sum of customer-minutes across all PSPS events). q) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. r) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. 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 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 2021 x) Number of trees that were worked on for EVM in HFTD Tier 2 in 2021 y) Number of trees that were worked on for EVM in HFTD Tier 2 in 2022 a) Miles of covered conductor installed in Non-HFTD in 2022 Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that includes the following information in separate colu	Aaro	ron Louie	2/24/2023	CalAdvocates-Liberty-2023WMP-03 Liberty 3/24/2023 3/29/2023 Response 03292023.pdf (libertyutilities.com)	1	5, 6	Electrical Infrastructure	5.2, 6.4.2
			Circuit name b) Circuit ID number c) Total circuit miles d) Circuit miles in Non-HFTD Areas e) 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 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 2021 o) Number of support structures replaced in Other HFTD in 2021 j) Number of support structures replaced in HFTD Tier 2 in 2021 c) Number of support structures replaced in HFTD Tier 2 in 2021 c) Number of support structures replaced in HFTD Tier 3 in 2021 c) Number of support structures replaced in HFTD Tier 3 in 2021 c) Number of support structures replaced in HFTD Tier 3 in 2022 d) Miles of LiDAR inspection in Non-HFTD in 2022 d) Miles of LiDAR inspection in Non-HFTD in 2022 d) Miles of LiDAR inspection in HFTD Tier 2 in 2021 d) Miles of LiDAR inspection in HFTD Tier 2 in 2021 d) Miles of LiDAR inspection in HFTD Tier 2 in 2021 d) Miles of LiDAR inspection in HFTD Tier 2 in 2021 d) Miles of LiDAR inspection in HFTD Tier 2 in 2021 d) Miles of LiDAR inspection in HFTD Tier 3 in 2021	4," Tab Q2 – Transmission.			CalAdvocates-Liberty-2023WMP-03 Liberty	1			
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	2 CalAdv-C	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		ron Louie	2/24/2023	3/24/2023 3/29/2023 Response 03292023.pdf (libertyutilities.com)	1	5, 6	Electrical Infrastructure	5.2, 6.4.3
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	3 CalAdv-C	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 of		ron Louie	2/24/2023	3/24/2023 3/29/2023 CalAdvocates-Liberty-2023WMP-03 Liberty Response 03292023.pdf (libertyutilities.com)		8	Line Removal	8.1.2.9
			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	4," Tab Q4 – Transmission Removals.				1			
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	4 CalAdv-C	f) Circuit miles removed or decommissioned in HFTD Tier 3 g) Reason(s) for removal or decommissioning. For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced where you		ron Louie	2/24/2023	3/24/2023 3/29/2023 Response 03292023.pdf (libertyutilities.com)		8	Line removal	8.1.2.9
			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 transmission assets i) Aerial inspections of transmission assets j) LiDAR inspections of distribution assets	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.			CalAdvocates-Liberty-2023WMP-03 Liberty				
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	5 CalAdv-C	· · · · · · · · · · · · · · · · · · ·		ron Louie	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	6 CalAdv-0	j) LiDAR inspections of distribution assets	Aaro	ron Louie	2/24/2023	3/24/2023 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 2023. a) VM	influenced where it performed work in 2023. Work performed in 2023 was planned using					
				b) Covered conductor installation c) Undergrounding	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					
				d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assetsg) Detailed inspections of transmission assets	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.					
				h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets	Subsections in section 6 of Eigerty's 2023 William pre Submission.					
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	7	CalAdv-03-3.7	j) LiDAR inspections of distribution assets k) LiDAR inspections of transmission assets.		Aaron Louie	2/24/2023	3/24/2023 3/29/2023 <u>CalAdvocates-Liberty-2023WMP-03 Liberty</u> Response 03292023.pdf (libertyutilities.com)		6 Risk Scoring N/A
				For each WMP initiative listed below, please state which and how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2023 will be sequenced. a) VM b) Covered conductor installation	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is					
				c) Undergrounding d) Distribution pole replacement	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					
				e) Grid sectionalization f) Detailed inspections of distribution assets	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.					
				g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets						
				i) Aerial inspections of transmission assets j) LiDAR inspections of distribution assets				Calledva catas Liberty 2022WMD 02 Liberty		
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	8	CalAdv-03-3.8	k) LiDAR inspections of transmission assets. 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	Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or	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
				perform work in 2024. a) VM b) Covered conductor installation	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					
				c) Undergrounding d) Distribution pole replacement	initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.					
				e) Grid sectionalization f) Detailed inspections of distribution assets						
				g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets						
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	9	CalAdv-03-3.9	j) LiDAR inspections of distribution assets k) LiDAR inspections of transmission.		Aaron Louie	2/24/2023	3/24/2023 CalAdvocates-Liberty-2023WMP-03 Liberty 3/24/2023 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 how work in 2024 will be sequenced. a) VM	circuit segment level to plan and prioritize how future work is sequenced in 2024. For		2,2,7,2025			
				b) Covered conductor installation c) Undergrounding	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.					
				d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets						
				g) Detailed inspections of distribution assets h) Aerial inspections of distribution assets						
CalAdvocates	3 CalAdvocates-Liberty-2023WMP-03	10	CalAdv-03-3.10	i) Aerial inspections of transmission assets		Aaron Louie	2/24/2023	3/24/2023 3/29/2023 Response 03292023.pdf (libertyutilities.com)		6 Risk Scoring N/A
				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	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 1.	-				
				b) The WMP Initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update				CalAdvocates-Liberty-2023WMP-04 Liberty	1	
CalAdvocates	4 CalAdvocates-Liberty-2023WMP-04	1	CalAdv-04-4.1	e) An explanation for the projected increase. For each WMP initiative for which you forecast capital expenditures in 2024 to be at least two times actual capital expenditures in 2022, please	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04 Liberty Response Questions 1-	Aaron Louie	2/24/2023	3/24/2023 3/31/2023 Response 03312023.pdf (libertyutilities.com)		WMP Financials N/A N/A
				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	4," Tab Response 2.				1	
CalAdvocates	4 CalAdvocates-Liberty-2023WMP-04	2	CalAdv-04-4.2	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.		Aaron Louie	2/24/2023	3/24/2023 CalAdvocates-Liberty-2023WMP-04_Liberty Response 03312023.pdf (libertyutilities.com)		WMP Financials N/A N/A
				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	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-04_Liberty Response Questions 1-4," Tab Response 3.	-				
				c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP Initiative number in Table 12 of your 2022 WMP Update				CalAdvocates-Liberty-2023WMP-04 Liberty	1	
CalAdvocates	4 CalAdvocates-Liberty-2023WMP-04	3	CalAdv-04-4.3	e) An explanation for the projected increase. For each WMP initiative for which you forecast operating expenditures in 2024 to be at least two times actual operating expenditures in 2022, please		Aaron Louie	2/24/2023	3/24/2023 3/31/2023 Response 03312023.pdf (libertyutilities.com)		WMP Financials N/A N/A
				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	4," Tab Response 4.				1	
CalAdvocates	4 CalAdvocates-Liberty-2023WMP-04	4	Colody O4 4 4	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		Agran Lavia	2/24/2023	CalAdvocates-Liberty-2023WMP-04_Liberty		MAAD Financials N/A
CalAdvocates	4 CalAdvoCates-Liberty-2023WWP-04	4	CalAdv-04-4.4	e) An explanation for the projected increase. a) As of January 1, 2022, have you identified transportation corridors within your service territory where falling or failing lines or poles could currently limit egress and/or ingress during an emergency? b) If the answer to part (a) is yes, please describe how you identify such transportation corridors. c) If	a) No. b) N/A c) N/A	Aaron Louie	2/24/2023	3/24/2023 4/10/2023 <u>Response 03312023.pdf (libertyutilities.com)</u>		WMP Financials N/A N/A
				available, please provide a geospatial data file that contains all current identified transportation corridors with ingress and egress hazards.				CalAdvocates-Liberty-2023WMP-05 Liberty		
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	1	CalAdv-05-5.1	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	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 2."	Aaron Louie	2/24/2023	3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com)		6 N/A N/A
				as of January 1, 2023. The Excel table should list each such circuit-segment as a row and include the following information in separate columns. For items (n) and (r), please include all relevant risk scores. For example, include vegetation risk score, conductor risk score, and any other driver-specific						
				risk scores you have developed. Please insert additional columns as needed to accommodate this. a) Name or ID number of each circuit segment b) Circuit name for the circuit that each segment is part of c) Circuit ID for the circuit that each segment is part of						
				d) Nominal voltage e) Total circuit-miles on the circuit-segment						
				f) Overhead circuit-miles on the circuit-segment in non-HFTD Areas g) Overhead circuit-miles on the circuit-segment in HFTD Tier 2						
				h) Overhead circuit-miles on the circuit-segment in HFTD Tier 3 i) Underground circuit-miles on the circuit-segment in non-HFTD Areas						
				j) Underground circuit-miles on the circuit-segment in HFTD Tier 2 k) Underground circuit-miles on the circuit-segment in HFTD Tier 3					1	
				I) Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing m) Consequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing n) Total wildfire risk score(s) for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Insert additional columns if needed						
				o) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you used for your 2022 WMP filing p) Probability of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing						
				q) Consequence of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing r) Total wildfire risk score(s) for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing. Insert additional columns	5					
				if needed s) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing.						
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	2	CalAdv-05-5.2	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), a	t Liberty does not have a geodatabase file containing the outputs from its wildfire risk model	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
				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 (c) of the previous question b) Items (p) through (s) of the previous question.						
								CalAdvocates-Liberty-2023WMP-05_Liberty		
CalAdvocates CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05 5 CalAdvocates-Liberty-2023WMP-05	3	CalAdv-05-5.3	Please 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."	Aaron Louie Aaron Louie	2/24/2023	3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-05_Liberty 4/10/2023 Response 04102023.pdf (libertyutilities.com)	1	6 N/A N/A 8 Grid Design enerations and maintenance (9.1) 9.1.6
CalAdvocates	5 CalAdvocates-Liberty-2023WIVIP-05	4	CalAuv-05-5.4	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	a) Yes. b) As part of its QA/QC process for 2022, Liberty assigned a third-party contractor to re-	Adron Louie	2/24/2023	3/30/2023 4/10/2023 <u>Response 04102023.pdf (libertydtilities.com)</u>		8 Grid Design, operations, and maintenance (8.1) 8.1.6
				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?	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					
				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	snow, equating to 0.44% re-inspected. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 5 and 6."				1	
				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.	c) No. The QA/QC reviews showed that there are some inconsistencies among inspectors, but he significant issues were captured by both inspections.	ıt				
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	5	CalAdv-05-5.5	e) If the answer to part (c) is no, please explain why not.	e) Minor inconsistencies among inspections are to be expected. Since major issues were captured with both inspections, no action is being taken at this time	Aaron Louie	2/24/2023	3/30/2023 CalAdvocates-Liberty-2023WMP-05 Liberty 4/10/2023 Response 04102023.pdf (libertyutilities.com)		8 Grid Design, operations, and maintenance (8.1) 8.1.6
	23237	-	33 3.3	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	a) Liberty completed one Program Manager Review Acknowledgement form for 2022 asset inspection QA/QC activities. Refer to supporting file: "CalAdvocates-Liberty-2023WMP-		. ,			5, -,
				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	05_Liberty Response Question 6a." b) Liberty completed one Senior Manager Annual Review Acknowledgement form for 2022					
				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.	asset inspection QA/QC activities. Refer to supporting file: "CalAdvocates-Liberty-2023WMP 05_Liberty Response Question 6b." c) Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question				1	
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	6	CalAdv-05-5.6	,,	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 CalAdvocates-Liberty-2023WMP-05 Liberty Response 04102023.pdf (libertyutilities.com)		8 Grid Design, operations, and maintenance (8.1) 8.1.6
		_		Please augment Table 13 of the non-spatial data tables in your WMP Quarterly Data Report 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	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-05_Liberty Response Question 7."					
				associated circuit b) ID number of the associated circuit					1	
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	7	CalAdv-05-5.7	c) Geographic latitude in decimal degrees, truncated to seven decimal places d) Geographic longitude in decimal degrees, truncated to seven decimal places e) Object/damage code or other description of defect		Aaron Louie	2/24/2023	3/30/2023 4/10/2023 Response 04102023.pdf (libertyutilities.com)		8 Grid Design, operations, and maintenance (8.1) 8.1.6
Camuvocates	5 Jan arocates Liberty-2023WIVIF-03	,	5411 tav-05-5./	Regarding Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 of 2022: a) Do you have an internal system of identifying priority levels for corrective notifications that differs from the priority levels specified in General Order 95, Rule 18?	a) Yes. b) Along with GO 95, Rule 18, Liberty uses its fire risk maps and asset condition codes to	CII EGGIC	-, -7, 2023	, _o, _o, _o, _o, _o, _o, _o, _o, _o, _o		Ond Design, operations, and maintenance (0.1) 0.1.0
				b) If the answer to part (a) is yes, please explain your internal priority system. c) Do you ever re-inspect corrective notifications before they are resolved?	assess the prioritization of corrective actions and replacements. c) Yes.					
				d) If the answer to the part (b) is yes, under what circumstances do you conduct re-inspections?	d) Liberty has conducted re-inspections through its detailed asset inspection program of assets that were inspected as part of its full system survey conducted in 2020. Additionally,					
CalAdvocates	5 CalAdvocates-Liberty-2023WMP-05	8	CalAdv-05-5.8	Please provide a list of any incidents in 2022 where the actions of a VM contractor posed a safety risk to workers and/or the public "Safety risk" here is	the Job Facilitator's role may include verification of issues identified during an inspection.	Aaron Louie	2/24/2023	3/30/2023 4/10/2023 <u>CalAdvocates-Liberty-2023WMP-05_Liberty</u> Response_04102023.pdf (libertyutilities.com)		8 Grid Design, operations, and maintenance (8.1) 8.1.6
				Please provide a list of any incidents in 2022 where the actions of a VM contractor posed a safety risk to workers and/or the public. "Safety risk" here is defined as any occurrence on a worksite where the contractor's behavior created a safety hazard for either workers or the general public. For each instance, please provide: a) The date you were informed of the safety issue	a safety risk to workers or the public.					
			2.11	b) The date that the original work that created the safety issue was performed c) Whether the safety issue concerned a transmission or distribution circuit			0.10 - 17 -	CalAdvocates-Liberty-2023WMP-06_Liberty		
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	1	CalAdv-06-6.1	d) The vegetation management initiative involved in the original work 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., projects that started before 2023 and are expected to continue in 2023, or projects that are expected to be	Refer to tab "2023" in supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty Response Questions 2 and 3."	Aaron Louie	2/24/2023	4/19/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com)		8 Vegetation Management and Inspections (8.2) 8.2.7
				completed after 2023), please include the project and report the work what you forecast will actually be performed in calendar year 2023. For each project, include the following information in separate columns, at a minimum: a) Order number	ESPENSE QUESTIONS & UNIU S.				1	
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	2	CalAdv-06-6.2	b) Program c) Circuit ID number	Pofor to tob (2024) : (1 (2 12 12 12 12 12 12 12 12 12 12 12 12 12	Aaron Louie	2/24/2023	4/19/2023 4/26/2023 CalAdvocates-Liberty-2023WMP-06_Liberty Response 04262023.pdf (libertyutilities.com)		8 Grid Design, operations, and maintenance (8.1) 8.1.2
				Provide your workplan that describes where and when you will perform system hardening on distribution circuits in 2024. For projects that you expect to partially complete in 2024 (i.e., projects that are expected to start before 2024 and are expected to continue in 2024, or projects that are expected to be completed after 2024), please include the project and report the work that you forecast will actually be performed in calendar year 2024. For						
				each project, include the following information in separate columns, at a minimum: a) Order number b) Program				CalAdvocates-Liberty-2023WMP-06_Liberty	1	
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	3	CalAdv-06-6.3	c) Circuit ID number For each of your 2023-2025 WMP system hardening initiatives, please provide disaggregated information related to expenditures and circuit miles	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty Response Question 4"	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
				treated in the attached table, Cal Advocates-Liberty-2023WMP-06_Attachment Tab 1. Add extra columns as needed. Note: for the purposes of this question, "line removal" refers to conductors that are permanently removed without replacement – for instance, as part of a remote grid project. This should be understood as identical to part (k) of questions 2 and 3 above					1	
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	4	CalAdv-06-6.4	should be understood as identical to part (k) of questions 2 and 3 above.		Aaron Louie	2/24/2023	4/19/2023 4/26/2023 CalAdvocates-Liberty-2023WMP-06_Liberty Response 04262023.pdf (libertyutilities.com)		8 Grid Design, operations, and maintenance (8.1) 8.1.2
				Regarding your PSPS circuit modeling capabilities: a) Please describe your present circuit modeling capabilities with regard to PSPS decision-making ("PSPS circuit modeling capabilities"), including with what level of granularity they	a) Liberty's 2023 WMP section 6.2 includes the baseline PSPS risk analyses and assessment performed at the beginning of this year by circuit. The PSPS risk decision-making framework					
				are able to determine how circuit hardening efforts or other changes to a line segment will affect PSPS thresholds. b) Please describe any improvements to the present PSPS circuit modeling capabilities that you	has not been developed and the model inputs currently do not incorporate grid hardening efforts and is a static study. The decision-making framework would have to consider current PSPS thresholds affecting each circuit and any current PSPS mitigation controls in place would			CalAdvocates-Liberty-2023WMP-06 Liberty		
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	5	CalAdv-06-6.5	b) Please describe any improvements to the present PSPS circuit modeling capabilities that you expect to implement in 2023. Identify any ignitions in 2022 associated with assets where you had an existing corrective notification at the time of the ignition. Please provide a	PSPS thresholds affecting each circuit and any current PSPS mitigation controls in place would also need to be factored in and calculated separately to support any proposed changes to Liberty did not have any ignitions in 2022 associated with assets where it had an existing		2/24/2023	4/19/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com)		6 Risk Analysis Framework (6.2) N/A
				spreadsheet listing each such ignition (as rows) with the following information in separate columns: a) Unique ignition ID b) Date of ignition	corrective notification at the time of the ignition					
CalAdvocates	6 CalAdvocates-Liberty-2023WMP-06	c	CalAdv-06-6.6	c) Cause of ignition d) Type of asset associated with the ignition		Aaron Louie	2/24/2023	4/19/2023 4/26/2023 Response 04262023.pdf (libertyutilities.com)		Q Grid Design enerations and maintenance (0.4)
CalAuvocates	O Cainavocates-Liberty-ZUZSWIVIP-Ub	U	CaiAuv-U0-0.6	le) Acres burned	1	, wron Louit	در ۱۲۹۱ کا ۱۷۵۵	., 20, 2020 TO 2020 Nesponse 04202025.pur (ilbertyutilities.com)		8 Grid Design, operations, and maintenance (8.1) 8.1.2

CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	1 CalAdv-07-7.1	Page 55 of Liberty's WMP states, "Liberty has not conducted a wildfire risk assessment using the 85th percentile consequence calculation." a) Why hasn't Liberty conducted a wildfire risk assessment using the 85th percentile consequence calculation? b) What other wildfire risk assessments has Liberty conducted instead?	a) In its 2023 WMP, Liberty provides a map in Figure 5-11 showing its service territory overlaid with the Social Vulnerability Index (SVI) and its current Reax wildfire risk polygons. Liberty provides an additional map in Appendix C of its 2023 WMP showing the SVI distribution, Liberty's updated utility risk analysis in its 2023 WMP, and major roads. Due to increased risk modeling requirements in the Office of Energy Infrastructure Safety (OEIS) Talal Harahsheh Talal Harahsheh 5/18/2023 5/23/2023 S/23/2023 S/23/2023 S/23/2023	5	Community Values at Risk (5.4) 5.4.3.2
			Page 57 of Liberty's WMP states: Survey reports produced by CAL FIRE identified 10 sub-divisions in South Lake Tahoe with no secondary egress, and one with limited egress. These sub-divisions consist mostly of single-family homes on flat land, surrounded by grass, trees, brush, and timber. In Placer County, CAL FIRE identified 21 subdivisions with no secondary egress, and three with limited egress. These areas include a mix of single-family homes, townhomes, and duplexes surrounded by similar vegetation, but the topography varies from flat land to slopes, ridges, and canyons. All 35 subdivisions were categorized by CAL	a) No. b) N/A c) Liberty completed mitigation actions during the 2020-2022 WMP cycle in limited egress areas throughout its service territory. Mitigation actions were driven by existing decision-making processes and risk analysis that did not consider egress. For an example of mitigation CalAdvocates-Liberty-2023WMP-07 Liberty	1	
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	2 CalAdv-07-7.2	FIRE as "Very High" Fire Hazard Severity Zones, a) Do Liberty's PSPS and wildfire risk analyses consider whether a location has no secondary egress or 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 cancellation entirely." a) Please describe what methods or strategies Liberty has adopted to ameliorate the problem noted above.	actions completed during the 2020-2022 WMP cycle in limited egress areas, refer to a) Liberty uses a variety of methods for notifying customers of O&M activities: • Door hangers • Sign boards	5	Community Values at Risk (5.4) 5.4.3.3
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	3 CalAdv-07-7.3	b) Please describe Liberty's method of maintaining accurate and up-to-date contact information for homeowners and renters in its service territory. c) Please describe Liberty's public communication strategy to informs homeowners and renters in its service territory when O&M activities are to be expected? Page 60 of Liberty's WMP states, "Liberty is currently working with the [Tahoe Regional Planning Agency] to update an existing memorandum of	• Mailed letters or postcards • Social media posts • Fmail Talal Harahsheh 5/18/2023 Talal Harahsheh 5/18/2023 5/23/2023 Talal Harahsheh 5/18/2023 Talal Harahsheh 5/18/2023 Talal Harahsheh Talal Harahsheh 5/18/2023 Talal Harahsheh Talal Harahsheh Talal Harahsheh Talal Harahsheh Talal Harahsheh	5	Community Values at Risk (5.4) 5.4.5
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	4 CalAdv-07-7.4	understanding ("MOU") for O&M activities to allow minor repairs, replacements and vegetation maintenance to be completed without agency review and approval." a) To date, has Liberty executed an updated memorandum of understanding with Tahoe Regional Planning Agency? b) If the answer the part (a) above is "no," please describe the status of developing an updated memorandum of understanding and the projected timeline to execute it.			Community Values at Risk (5.4) 5.4.5
			Page 64 of Liberty's WMP states: Although the current approach provides significant advancements over earlier efforts, it was neither reasonable nor feasible to conduct all the calculations and analyses provided in the 2023-2025 Wildfire Mitigation Plan Technical Guidelines ("Technical Guidelines") prior to Liberty's 2023 WMP submission. Liberty, however, is committed to continuing to evolve and improve its risk modeling practices and intends to conduct the analyses and calculations described in the Technical Guidelines, to the extent possible, as part of future work. a) Please identify each calculation or analysis provided	a) Refer to Liberty's 2023 WMP for the analysis that Liberty completed in advance of its 2023 WMP submission. Refer to the OEIS 2023-2025 Wildfire Mitigation Plan Technical Guidelines for the calculations and analysis provided in the guidelines. b) OEIS released its final 2023-2025 WMP Technical Guidelines on December 6, 2022. In late		
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	5 CalAdv-07-7.5	in the 2023-2025 WMP Technical Guidelines that Liberty has not yet conducted. Not each item listed in response to part (a) identify the recourse constraint(s) that hindered completion prior to Liberty's 2022 WMP submission. Page 70 of Liberty's WMP states that social vulnerability, physical vulnerability, and coping capabilities are not factors currently included in the wildfire risk analysis though Liberty intends to incorporate these factors in its future risk modeling process. a) When Liberty eventually incorporates the factor "physical vulnerability" within future wildfire risk analyses, what attributes/characteristics would Liberty utilize to define "physical vulnerability"? What data does Liberty currently maintain or collect to measure physical vulnerability?	analytics utilizing its Wildfire Risk Reduction Model ("WRRM"). Liberty received its first analytics package with the results from WRRM in late February 2022. Additionally, in late a) Liberty has not determined all attributes/characteristics it will utilize to define physical	6	Risk Methodology and Assessment 6
CalAdvocates	7 CalAdvocates-Liberty-2023WMP-07	6 CalAdv-07-7.6	c) When Liberty eventually incorporates the factor "social vulnerability" within future wildfire risk analyses, what attributes/characteristics would Liberty utilize to define "social vulnerability"? 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 lasts for five or more minutes. The Excel sheet should list each outage as a row, with the following information in columns: a) ID number of the circuit affected.	Critical Facilities) based on physical vulnerability. b) Liberty maintains a list of MBL customers and self-identified AFN customers. Talal Harahsheh 5/18/2023 5/23/2023 CalAdvocates-Liberty-2023WMP-07 Liberty Response 05232023.pdf (libertyutilities.com)	1	Risk Methodology and Assessment 6.2
CalAdvocates	8 CalAdvocates-Liberty-2023WMP-08	1 CalAdv-08-8.1	 b) Name of the circuit affected. c) Date of the outage. d) Cause of the outage. Page 70 of Liberty's WMP states that social vulnerability is not a factor currently included in Liberty's wildfire risk analysis, though Liberty intends to 	Talal Harahsheh Tolal	8	Grid Design, operations, and maintenance (8.1)
			incorporate it in its future risk modeling process. a) Please identify the constraint(s) that hindered the incorporation of social vulnerability prior to Liberty's 2023 WMP submission. b) State when Liberty anticipates being able to include social vulnerability as part of Liberty's risk modeling process.c) In which year of this WMP cycle does Liberty plan on being able to include social vulnerability in its future risk modeling process?	submission of the 2023 WMP, Liberty was not able to incorporate social vulnerability into its 2023 WMP submission due to time constraints. b) Liberty plans to incorporate social vulnerability considerations in 2024 and report on this enhancement in its future WMP filings. CalAdvocates-Liberty-2023WMP-09 Liberty		
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	1 CalAdv-09-9.1	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 process. a) Please identify the constraint(s) that hindered the incorporation of physical vulnerability prior to Liberty's 2023 WMP submission. b) State when Liberty anticipates being able to include physical vulnerability as part of Liberty's risk modeling process.	c) See Response 1b. a) Liberty's current fire science consultant, Dr. Chris Lautenberger, has advised Liberty that there is currently no validated generalized methodology that relates physical characteristics of structures to their survivability in wildland fires. Put differently, it is Liberty's understanding that fragility curves to quantify a structure's probability of being damaged or destroyed in a fire based on its physical characteristics do not exist. Talal Harahsheh 5/26/2023 6/1/2023 6/1/2023 Response 06012023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-09 Liberty		Risk Methodology and Assessment 6.2
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	2 CalAdv-09-9.2	c) In which year of this WMP cycle does Liberty plan on being able to include physical vulnerability in its future risk modeling process? Page 70 of Liberty's WMP states that coping capability is not a factor currently included in Liberty's wildfire risk analysis, though Liberty intends to incorporate it in its future risk modeling process. a) Please identify the constraint(s) that hindered the incorporation of coping capability prior to Liberty's 2023 WMP submission.	fire based on its physical characteristics do not exist. b) Liberty intends to incorporate physical vulnerability into its risk modeling when generalized a) With the WMP technical guidelines issued approximately 3 months prior to submission of the WMP completeness check, Liberty was not able to incorporate coping capacity into its 2023 WMP submission due to time constraints. CalAdvocates-Liberty-2023WMP-09 Liberty Talal Harahsheh	6	Risk Methodology and Assessment 6.2
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	3 CalAdv-09-9.3	 b) State when Liberty anticipates being able to include coping capability as part of Liberty's risk modeling process. c) In which year of this WMP cycle does Liberty plan on being able to include coping capability in its future risk modeling process? Page 70 of Liberty's WMP states the following factors are included as part of Liberty's wildfire risk analysis: Equipment/assets, Topography, Weather, 	b) Liberty plans to incorporate coping capacity in 2024 and report on this enhancement in its future WMP filings. c) See Response 3b. a) Equipment/assets: GIS data are used to construct an ignition buffer surrounding Liberty's	6	Risk Methodology and Assessment 6.2
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	4 CalAdv-09-9.4	Vegetation, Climate change, Assets at risk, and Fire ignition and spread. Please explain how each of these factors impacts Liberty's quantification of risk at the circuit level: a) Equipment/assets b) Topography	equipment and assets for use in fire spread modeling. b) Topography: Topography is an input to Liberty's fire spread modeling. c) Weather: Weather an input to Liberty's fire spread modeling. d) Vegetation: Vegetation is an input to Liberty's fire spread modeling. e) Climate change: Liberty conducted climate-adjusted fire spread modeling. Talal Harahsheh 5/26/2023 6/1/2023 Response 06012023.pdf (libertyutilities.com)		Risk Methodology and Assessment 6.2
CalAuvocates	5 CalAdvocates-Liberty-2025 WIVIP-09	4 CalAuv-09-9.4	c) Weather Page 70 of Liberty's WMP states the following factors are included as part of Liberty's wildfire risk analysis: • Equipment/assets, • Topography, • Weather,	a) For the reasons stated below, no formal processes are currently in place to verify the accuracy of changes in the quantification of risk related to the following factors: • 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 – not a		NISK Methodology and Assessment 0.2
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	5 CalAdv-09-9.5	 Vegetation, Climate change. 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." Please explain why Liberty does not consider the burn probability from fires caused by sources other than utilities. 	developer – of these datasets that serve as inputs to its fire spread modeling. In all cases, Liberty uses open-source, widely-used, and industry standard data sets developed by Liberty's fire risk modeling currently addresses only fires caused by its infrastructure. Impacts from other fires to Liberty's system is a grid resiliency issue that Liberty may address in the future after its utility-caused fire risk modeling has matured CalAdvocates-Liberty-2023WMP-09_Liberty Response 06012023.pdf (libertyutilities.com)	6	Risk Methodology and Assessment 6.2
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	6 CalAdv-09-9.6	Page 81 of Liberty's WMP, states "Overall utility risk is calculated by circuit from wildfire risk and PSPS risk, with an 80% weight to wildfire risk and 20% to PSPS risk."	Talal Harahsheh Tolal	6	Risk Methodology and Assessment 6.2
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	7 CalAdv-09-9.7	 a) Please explain how Liberty arrived at the abovementioned specific weighting of wildfire risk and PSPS risk. b) Has Liberty consulted with any agencies, universities, research groups, or other entities on the calculation of the abovementioned weighting of wildfire risk and PSPS risk? Please list those entities if so. Page 96 of Liberty's WMP presents Table 6-7: Liberty Top-Risk Circuits, which provides risk scores for Liberty's top 20 risk-contributing circuits. With this 	read "Overall utility risk is calculated by summing wildfire risk and PSPS risk by circuit." The statement about 80/20 weighting was inadvertently left in Liberty's 2023 WMP from a previous draft. Talal Harahsheh 5/26/2023 6/1/2023 CalAdvocates-Liberty-2023WMP-09 Liberty Response 06012023.pdf (libertyutilities.com)	6	Risk Methodology and Assessment 6.2
			context: a) Does Liberty sequence its top risk circuit projects one by one according to the risk ranking or does Liberty work on multiple top risk circuit projects simultaneously? b) On how many of the top 20 risk-contributing circuits will Liberty complete grid design and system hardening projects for wildfire mitigation during the	b) Liberty plans to conduct grid design and system hardening work on 16 of the top 20 risk-contributing circuits in 2023. c) No. et d) As stated in Section 7.2.2.3 of its 2023 WMP, Liberty does not yet have sufficient CalAdvocates-Liberty-2023WMP-09 Liberty		
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	8 CalAdv-09-9.8	2023-2025 WMP cycle? Page 96 of Liberty's WMP presents Table 6-7: Liberty Top-Risk Circuits, which provides risk scores for Liberty's top 20 risk-contributing circuits. Please provide an Excel table that augments Table 6-7 with information about planned wildfire mitigation measures on each circuit during the 2023-2025 WMP cycle. Specifically, the table should add these new columns to Table 6-7: a) Brief description of grid design and system hardening work planned for wildfire mitigation purposes in 2023-2025 (for example: 2.0 miles of	information to calculate the risk reductions for ton-risk circuits and plans to develop an Refer to file: CalAdvocates-Liberty-2023WMP-09_Liberty Response Question 9 Talal Harahsheh 5/26/2023 6/1/2023 6/1/2023 Response 06012023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-09_Liberty Response Question 9	1	Risk Methodology and Assessment 6.4
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	9 CalAdv-09-9.9	undergrounding, 1.0 miles of covered conductor installation, and installation of 1 new recloser on this circuit). b) The month and year when Liberty began project planning for the work identified in part (a). Pages 104-105 of Liberty's WMP states: 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 the pole asset type and produces effective decision-making tools Liberty will continue building out the risk-informed decision-making tools for multiple assets to better plan future investments and repairs and maintenance plans given budget and resource constraints.	Talal Harahsheh 5/26/2023 6/1/2023 6/1/2023 Response 06012023.pdf (libertyutilities.com) a) Refer to file: CalAdvocates-Liberty-2023WMP-09_Liberty Response Question 10a for the scope of work of the pilot project with Direxyon. Liberty provided data to Direxyon that included GIS pole information and asset inspection information that was used to model in service risk for pole assets. The information included, but was not limited to, pole age, pole	1	Risk Methodology and Assessment 6.4
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	10 CalAdv-09-9.10	Please describe the goals, analytical methods, and duration of the abovementioned pilot project by Direxyon. b) Describe the success criteria for the abovementioned Direxvon pilot project — in other words, what criteria is Liberty using to evaluate the success of Page 107 of Liberty's WMP states "Liberty's strategy development for this WMP did not utilize wildfire risk scores developed by Reax." a) Does Liberty plan on utilizing the wildfire risk scores developed by Reax to help plan future decisions regarding wildfire mitigation? b) If the answer to part (a) above is yes, when does Liberty plan on utilizing the wildfire risk scores developed by Reax? c) If the answer to part (a) above is yes, please describe how Liberty's current approach will change with the utilization of the wildfire risk scores by	type, date of last inspection, GO 165 condition findings, vegetation LiDAR clearance findings, and financial costs of inspection and repair/replacement. Data was also provided from a) Yes. b) Liberty plans on utilizing the wildfire risk scores developed by Reax in 2024. c) 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-informed	6	Risk Methodology and Assessment 6.7
CalAdvocates	9 CalAdvocates-Liberty-2023WMP-09	11 CalAdv-09-9.11	Reax. d) If the answer to part (a) is no. please explain why Liberty will not utilize the wildfire risk scores by Reax to help plan future decisions regarding wildfire. On page 173 of its WMP, Liberty states that its 2022 target for Patrol Inspections of Distribution Electric Lines and Equipment was erroneously established at 706.3 miles, causing Liberty to miss its 2022 inspection target by 203 miles. Please respond to the following: a) Explain how Liberty mistakenly set a target of 706.3 miles. b) State the basis for why Liberty believes the target should have been closer to 503 miles.	decision-making assessment and monitoring to improve its overall risk reduction performance over time. a) Liberty erroneously reported its target as the total overhead miles for its service territory. Liberty does not perform patrol inspections in areas where detailed inspections are being conducted and thus the target should have been a function of total overhead miles minus CalAdvocates-Liberty-2023WMP-09_Liberty Response 06012023.pdf (libertyutilities.com) CalAdvocates-Liberty-2023WMP-09_Liberty Response 06012023.pdf (libertyutilities.com)	7	Wildfire Mitigation Strategy Development
CalAdvocates	10 CalAdvocates-Liberty-2023WMP-10	1 CalAdv-10-10.1	(the amount Liberty was able to complete in 2022). c) Explain Liberty's process, procedure, or protocol for determining annual asset inspection targets for each type of inspection Liberty conducts. On page 174 of its WMP, Liberty states that it completed Quality Assurance and Quality Control (QA/QC) on 0.0044% of its detailed asset inspections in 2022, while Liberty's target was to QA/QC 0.0050% of the detailed asset inspections in 2022. Please respond to the following:	overhead detailed inspection miles. b) Liberty's 2022 target of 503 miles for Patrol Inspections of Distribution Electric Lines and Foundment is a function of total overhead miles (706.3 miles) minus detailed inspections a) 24 b) Yes. CalAdvocates-Liberty-2023WMP-10_Liberty Response_06022023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1) 8.1.3
CalAdvocates	10 CalAdvocates-Liberty-2023WMP-10	2 CalAdv-10-10.2	a) How many individual asset inspections did Liberty conduct QA/QC on in 2022? b) Are both transmission and distribution detailed inspections included in the 0.0044% figure? c) If the answer is to part (b) above is "no," please answer which type of detailed inspections is included in the 0.0044% figure. d) If the answer is to part (b) above is "ves." please breakdown of each type of detailed inspections is included in the 0.0044% figure. 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-	c) N/A 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 the a) The discrepancy is a typo. Liberty's QA/QC target for detailed asset inspections is 0.5%. Talal Harahsheh 5/26/2023 6/1/2023 6/2/2023 CalAdvocates-Liberty-2023WMP-10_Liberty Response 06022023.pdf (libertyutilities.com)	1 8	Grid Design, operations, and maintenance (8.1) 8.1.3
CalAdvocates	10 CalAdvocates-Liberty-2023WMP-10	3 CalAdv-10-10.3	inspected by third-party inspectors. Minimal differences were noted by the third-party inspectors, who found only very minor infractions during the reinspections if differences were noted at all. a) Please explain the apparent discrepancy between the targets stated on pages 174 and 182 for QA/QC of detailed asset inspections (0.005% on page 174 and 0.5% on page 182). b) If these two targets refer to different types of OA/OC activities, please provide a thorough description of each activity that identifies the similarities.	Talal Harahsheh 5/26/2023 6/1/2023 CalAdvocates-Liberty-2023WMP-10 Liberty Response 06022023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (8.1) 8.1.6
CalAdvocates	10 CalAdvocates-Liberty-2023WMP-10	Λ (CalΔdv-10-10 Λ	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 reinspected by third-party inspectors. Minimal differences were noted by the third-party inspectors, who found only very minor infractions during the reinspections if differences were noted at all. Please respond to the following: a) How many third-party QA/QC checks were completed on detailed asset inspections in 2022?		8	Grid Design, operations, and maintenance (8.1) 8.1.6
			b) Of the checks included in the answer to part (a). how many checks noted "differences" between the initial inspections and the third-party OA/OC 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. Liberty also states that it "will halt its detailed inspections in order to catch up with its open maintenance work orders and resume detailed inspections in 2024."	a) Liberty halted its detailed inspections on January 1st, 2023, with the exception of detailed underground inspections due in 2023. b) 40.3 circuit miles. c) Liberty has not completed detailed inspections yet in 2023. d) Liberty is currently planning to resume its detailed inspections on January 1st, 2024. CalAdvocates-Liberty-2023WMP-10_Liberty		
CalAdvocates	10 CalAdvocates-Liberty-2023WMP-10	5 CalAdv-10-10.5	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. Please respond to the following: a) Explain Liberty's rationale for halting detailed inspections in 2023 to reduce the number of open work orders on Liberty's system, as referenced in the	e) Liberty will remain in compliance with GO95 and 165. a) Liberty is halting its detailed overhead inspections in 2023 in order to avoid further overlap of infractions found in its 2020 full system survey and prioritize repairs to infractions found during the system survey b) Liberty's full system survey completed in 2020 included all overhead lines that normally are	8	Grid Design, operations, and maintenance (8.1) 8.1.7
CalAdvocates	10 CalAdvocates-Liberty-2023WMP-10	6 CalAdv-10-10.6	quote above. b) Explain the prudence of halting detailed asset inspections until 2024. a) Describe Liberty's current staffing resources allocated to each of the following items under asset management, including but not limited to: a. Inspections b. Maintenance c. Resolution of open work orders and any other items not listed above.	inspected over a five-year period. Liberty will remain compliant during 2023 without completing any overhead detailed inspections. a) Liberty's current staffing resources include: a. Inspections: Five internal inspectors and one contract inspector b. Maintenance: Four internal crews and three contract crews available c. Open work orders and other: Same as above plus five internal troublemen	8 N/A	Grid Design, operations, and maintenance (8.1) 8.1.7 N/A N/A
CalAdvocates	10 CalAdvocates-Liberty-2023WMP-10	7 CalAdv-10-10.7	b) Please explain how Liberty's current staffing is sufficient or not sufficient to comply with regulatory requirements for asset management and	b) Liberty's current staffing has been sufficient to comply with regulatory requirements for asset management and inspection. a) Yes. b) N/A CalAdvocates-Liberty-2023WMP-10_Liberty Alal Harahsheh 5/26/2023 6/1/2023 6/2/2023 6/2/2023 CalAdvocates-Liberty-2023WMP-10_Liberty Response 06022023.pdf (libertyutilities.com)		
CalAdvocates	11 CalAdvocates-Liberty-2023WMP-11	1 CalAdv-11-11.1	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 framework. 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: a) What is the total number of "discussion points" that Liberty will plot on Figure 7-1 while conducting its risk evaluation process?	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. Liberty Response to DR CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com) Liberty Response to DR CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1) 7.1.1
CalAdvocates	11 CalAdvocates-Liberty-2023WMP-11	2 CalAdv-11-11.2	b) Please list all of the "discussion points" that Liberty will plot on Figure 7-1 as part of the risk identification and analysis. c) Please provide any documents generated from Liberty's risk evaluation process related to the Topaz circuit. d) Please provide any documents generated from Liberty's risk evaluation process related to the Muller circuit. e) Please provide any documents generated from Liberty's risk evaluation process related to the Mevers circuit. Pages 116-117 of Liberty's WMP identify the Topaz circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context:	b) Examples of discussion points included in the risk evaluation process are: • identification of all risk events; • likelihood of wildfire risk drivers; • impacts of significant weather (snow and wind) on asset degradation and health: a) Yes. b) Liberty is completing traditional overhead hardening on three projects in 2023. Those	7	Risk Evaluation (7.1) 7.1.1
CalAdvocates	11 CalAdvocates-Liberty-2023WMP-11	3 CalAdv-11-11.3	a) Does Liberty have any system hardening mitigation work planned in 2023 for the Topaz circuit listed above? b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit. c) If the answer to part (a) above is no, please explain why Liberty has chosen not to conduct mitigation work on this circuit in 2023. d) Does Liberty have any system hardening mitigation work planned in 2024 for the Topaz circuit listed above? 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	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 d) Yes. Talal Harahsheh 6/1/2023 6/6/2023 6/6/2023 Liberty Response to DR CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1) 7.1.3
CalAdvocates	11 CalAdvocates-Liberty-2023WMP-11	A Colod: 11 11 1	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? b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit. c) If the answer to part (a) above is no, please explain why Liberty has chosen not to conduct mitigation work on this circuit in 2023.	b) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys. c) N/A d) Yes. 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 bardening on this circuit. The first Talal Harahsheh Talal Harahsheh 6/1/2023 6/6/2023 6/6/2023 6/6/2023		Risk Evaluation (7.1) 7.1.3
CalAdvocates	TI CalAuvoCates-Liberty-2023WMP-11	4 CalAdv-11-11.4	d) Does Liberty have any system hardening mitigation work planned in 2024 for the Muller circuit listed above? Pages 116-117 of Liberty's WMP identify the Meyers circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context: a) Does Liberty have any system hardening mitigation work planned in 2023 for the Meyers circuit listed above? b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit. c) If the answer to part (a) above is no, please explain why Liberty has chosen not to conduct mitigation work on this circuit in 2023.	system surveys. Liberty is also planning to do some system hardening on this circuit. The first a) Yes. b) Liberty is planning to complete two covered conductor projects on Meyers circuits in 2023. Those projects are Celio A (1.6 miles) and Celio B (0.93 miles). Liberty will also complete 0.11 miles of undergrounding on the Cascade Project. Liberty is also replacing or repairing various poles on these circuits to address needs found during system surveys. Talal Harahsheh 6/1/2023 6/6/2023 6/6/2023 2023WMP-11.pdf (libertyutilities.com) Liberty Response to DR CalAdvocates-Liberty-		/.1.3
CalAdvocates	11 CalAdvocates-Liberty-2023WMP-11	5 CalAdv-11-11.5	c) If the answer to part (a) above is no, please explain why Liberty has chosen not to conduct mitigation work on this circuit in 2023. d) Does Liberty have any system hardening mitigation work planned in 2024 for the Mevers circuit listed above? Page 127 of Liberty's WMP states, "Liberty is currently evaluating wildfire risk results in consultation with its analytics team. Liberty has developed an interim mitigation strategy for its vegetation portfolio and plans to expand this strategy to incorporate assets in the future." When does Liberty anticipate it will have expanded its interim mitigation strategy to incorporate asset management measures, as referenced in the quote?	c) N/A Talal Harahsheh 6/1/2023 6/6/2023 6/6/2023 2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1) 7.1.3
CalAdvocates	11 CalAdvocates-Liberty-2023WMP-11	6 CalAdv-11-11.6		Talal Harahsheh Talal	7	Risk Evaluation (7.1) 7.1.4

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				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) Are any WMP activities or initiatives that Liberty is executing in 2023 based upon the abovementioned risk based decision-making process?	a) No.b) N/Ac) The abovementioned risk based decision-making process is not complete. Liberty used risk-					
CalAdvocates	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. c) If the answer to part (a) is no, please explain why not.	based principles and tools (i.e., Reax risk map) to inform decision-making. Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty Response to DR CalAdvocates-Liberty- 2023WMP-11.pdf (libertyutilities.com)	7 Risk Evaluation (7.1) 7.1.4
	,			Page 135 of Liberty's WMP states: In conjunction with this study, Liberty also plans to assess the asset risk reduction and vegetation risk reduction at an operational performance level	a) Examples of evaluation criteria Liberty considered are cost, accuracy of risk identification and model outputs, system compatibility, the feasibility of scenarios and the ability to					
Calla dua andra	11 CalAdvocates-Liberty-2023WMP-11	0	C-10-1-14-14-0	utilizing IBM's work management platform. IBM's Maximo asset health and predict solution that was customized for Liberty will integrate asset risk and detailed vegetation risk scores to help asset and vegetation managers better assess operational risk to plan and adjust work activities for significant weather event days, including elevated high fire risk days.	l operationalize model outputs given available resources. b) Liberty has decided to not move forward with IBM's proposed solution at this time. c) Liberty has decided to not move forward with IBM's proposed solution at this time. Talal Harahsheh	6/4/2022	c /c /2022	c /c /2022	Liberty Response to DR CalAdvocates-Liberty-	7 Risk Evaluation (7.1) 7.2.2
CalAdvocates	11 CalAdvocates-Liberty-2025WWP-11	0	CalAdv-11-11.8	a) Describe the success criteria for the abovementioned IBM Maximo project — in other words, what criteria is Liberty using to evaluate the accuracy of 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	a) Liberty plans to have an initial risk-informed decision-making framework for overhead assets by August 2023.	6/1/2023	6/6/2023	0/0/2023	3 2023WMP-11.pdf (libertyutilities.com)	/ RISK EVALUATION (7.1) 7.2.2
				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. a) When (i.e., month and year) does Liberty expect the development (referenced in the quote above) of the risk-informed decision-making framework to be finished?	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-	
CalAdvocates	11 CalAdvocates-Liberty-2023WMP-11	9	CalAdv-11-11.9	b) When (i.e., month and year) does Liberty expect all risk studies to be delivered (as mentioned in the quote above)? On pp. 29-30 of its WMP, Liberty describes its actual WMP spends for the 2020-2022 cycle. Please provide a breakdown of the actual spends including at least the following categories:	risk modeling guidelines, and collaborative discussions with stakeholders through processes a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS on March 8, 2023.	6/1/2023	6/6/2023	6/6/2023	3 2023WMP-11.pdf (libertyutilities.com)	7 Risk Evaluation (7.1) 7.2.3
				 Risk assessment and modeling Grid design and system hardening 	b) See response 1a. c) See response 1b.				CalAdvocates-Liberty-2023WMP-12 Liberty	
CalAdvocates	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 provide a breakdown of the described proposed 	a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS	6/6/2023	6/9/2023	6/9/2023	Response 06092023.pdf (libertyutilities.com)	4 Proposed Expenditures (4.3)
				 expenditures including at least the following categories: Risk assessment and modeling Grid design and system hardening 	on March 8, 2023. b) See response 2a. c) See response 2b.					
CalAdvocates	12 CalAdvocates-Liberty-2023WMP-12	2	CalAdv-12-12.2	 Asset management and inspections Vegetation management and inspections On pp. 201-202 of its WMP, Liberty provides Table 8-18: "Liberty Vegetation Inspections Targets by Year." Please explain why the row describing 	Talal Harahsheh The blank row in Table 8-18 is a formatting error on the table carrying over from page 201 to	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty Response_06092023.pdf (libertyutilities.com)	4 Proposed Expenditures (4.3)
				Liberty's Vegetation Targets by Year for the Initiative Activity "Program – LiDAR" is blank.	page 202. There should only be one row for "Vegetation Management Inspection Program – LiDAR" and the initiative activity row was inadvertently split up due to the page break.					
CalAdvocates	12 CalAdvocates-Liberty-2023WMP-12	3	CalAdv-12-12.3	On p. 209 of its WMP, Liberty provides Figure 8-4: "Liberty VM Inspection Overview."	Talal Harahsheh a) If Liberty VM field personnel are unable to perform their job function due to a customer	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty Response_06092023.pdf (libertyutilities.com)	8 Vegetation Management and Inspections (8.2) 8.2.1.2
				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.	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					
CalAdvocates	12 CalAdvocates-Liberty-2023WMP-12	4	CalAdv-12-12.4	her property for either a vegetation inspection or a vegetation maintenance activity.	photographed for reference and record keeping. Liberty VM field personnel (VM inspectors, VM workers) communicate the refusal as soon as possible to their immediate supervisor for resolution. Every effort should be made by the Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty Response_06092023.pdf (libertyutilities.com)	8 Vegetation Management and Inspections (8.2) 8.2.2
				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 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 181+ days.	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					
CalAdvocates	12 CalAdvocates-Liberty-2023WMP-12	5	CalAdv-12-12.5	c) Please describe the actions Liberty is currently taking to address the 2,588 past due work orders in HFTD Tier 2 Areas with ages of 181+ days. d) When does Liberty expect that all of these 2,588 past due work orders in HFTD Tier 2 Areas with ages of 181+ days will be fully resolved? Please explain your response.	WMP (page 240 – 241) and per its VM-05, Vegetation Threat Procedure. Liberty intends to complete work orders and mitigate identified tree conditions within the timelines specified in its VM-05 based on the priority level of assigned to the vegetation work order at the time of Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-12_Liberty Response 06092023.pdf (libertyutilities.com)	8 Vegetation Management and Inspections (8.2) 8.2.6
	,			Please provide copies of the following documents: a) Corporate Emergency Management Plan (CEMP), dated April 27, 2022, referenced on p. 284 of your WMP b) Liberty Utilities Public Safety Power Shutoff Playbook, dated June 13, 2022, referenced on p. 284 of your WMP	a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP) b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook					
Calla dua andra	42 C-14 do	4	C-10-1- 12-12-1	b) Liberty Offilties Public Safety Power Shutoff Playbook, dated June 13, 2022, referenced on p. 284 of your WiviP	T-1-111h-sh-sh-sh	6/6/2022	c /o /2022	c /o /2022	CalAdvocates-Liberty-2023WMP-13_Liberty	
CalAdvocates	13 CalAdvocates-Liberty-2023WMP-13	1	CalAdv-13-13.1	On p. 311 of its WMP, Liberty states "NV Energy is the [Transmission Owner] for Liberty A specific plan for communicating with NV Energy including the information to be provided is included in the Liberty CEMP"	b) N/A	6/6/2023	6/9/2023	6/9/2023	Response_06092023.pdf (libertyutilities.com)	8 Emergency Preparedness (8.4) 8.4.2
				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.	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	
CalAdvocates	13 CalAdvocates-Liberty-2023WMP-13	2	CalAdv-13-13.2	d) Has Liberty ever experienced any de-energizations (including, but not limited to PSOM) because of loss of electricity supply from NV Energy On p. 162 of its WMP, Liberty states "[T]hese programs, in particular Liberty's SRP program, may reduce the need for PSPS in certain areas."	energizations." overbroad, unduly burdensome, and not reasonably calculated to lead to the a) Liberty's SRP program is not currently impacting Liberty's PSPS protocols. In 2023, Liberty is working with University of Nevada, Reno (UNR) to develop the SRP settings and discuss how	6/6/2023	6/9/2023	6/9/2023	Response 06092023.pdf (libertyutilities.com)	8 Emergency Preparedness (8.4) 8.4.3.2
				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 instead.	this could impact PSPS protocols. If SRP settings are set sensitive enough, then the ignition risk from a line could be low enough to act in place of a PSPS. The settings that Liberty is				CalAdvocates-Liberty-2023WMP-13 Liberty	
CalAdvocates	13 CalAdvocates-Liberty-2023WMP-13	3	CalAdv-13-13.3	Please provide a description of the weather conditions in which Liberty enables its SRP program.	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 tonic with UNR and other major utilities in 2023. a) Various weather conditions influence the SRP decision process, including wind conditions,	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
				b) Please identify the months or seasons in which Liberty enables its SRP program. c) Please provide relevant work documents or procedures that Liberty uses related to enabling its SRP program.	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	13 CalAdvocates-Liberty-2023WMP-13	4	CalAdv-13-13.4	On p. 162 of its WMP, Liberty states "Liberty will be expanding the 2022 Fast Trip, or SRP, pilot project because of its effectiveness"	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, Liberty	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-13 Liberty Response 06092023.pdf (libertyutilities.com)	8 Grid Design, operations, and maintenance (8.1) 8.1.2.6
				a) In Liberty's response to CalAdvocates-Liberty-2023WMP-03, Question 1, the excel sheet column Q "q. Total customer-minutes of de-energization on the circuit during fast-trip settings in 2021" provides a value of 20244.00 for the Circuit Meyers 3300. Please explain if the pilot SRP program began in 2021 or if Liberty used a different program for this de-energization.	utilized "wildfire mode" settings which removes reclosing. The SRP program takes this a step further by removing reclosing and lowering the trip settings to a number that impacts relay					
CalAdvocates	13 CalAdvocates-Liberty-2023WMP-13	5	CalAdv-13-13.5	b) There are values listed in Liberty's response to CalAdvocates-Liberty-2023WMP-03, Question 1, the excel sheet column R "r. Total customer-minutes of de-energization on the circuit during fast-trip settings in 2022". Please clarify if the values listed in Liberty's response were due to the SRP program	b) In 2022, Liberty utilized a mix of SRP settings and "wildfire mode" settings because the Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CalAdvocates-Liberty-2023WMP-13 Liberty Response 06092023.pdf (libertyutilities.com)	8 Grid Design, operations, and maintenance (8.1) 8.1.2.6
				Liberty's response to question 8 of data request CalAdvocates-Liberty-2023WMP-11 discusses an "IBM Maximo project" and when the platform would be complete and operational. Liberty's response states, "Liberty has decided to not move forward with IBM's proposed solution at this time." a) Please explain why Liberty has decided not to move forward with the proposed solution from IBM to consolidate its risk data sources.	considered factors including: • cost;					
CalAdvocates	14 CalAdvocates-Liberty-2023WMP-14	1	CalAdv-14-14.1	b) Is Liberty pursuing an alternative solution for the same purpose? If so, please explain.	 system compatibility, particularly the risk of moving forward with the solution prior to SAP implementation later this year; and the ability to operationalize model outputs. 	6/8/2023	6/13/2023	6/13/2023	CalAdvocates-Liberty-2023WMP-14_Liberty Response 06132023.pdf (libertyutilities.com)	
				Please explain why your QDR for Q1 of 2022 reports the total number of distribution ignitions in 2020 and 2021 as 26, but your QDR for Q2 of 2022 reports the total number of distribution ignitions in 2020 and 2021 as 4.	The number of ignitions reported in Liberty's QDR for Q1 and Q2 of 2022 is incorrect. Liberty's QDR for Q1 of 2023 correctly reports the total number of distribution ignitions in 2020 and 2021 as four.					
CalAdvocates	15 CalAdvocates-Liberty-2023WMP-15	1	CalAdv-15-15.1		Talal Harahsheh	6/14/2023	6/19/2023	6/20/2023	CalAdvocates-Liberty-2023WMP-15_Liberty Response 06202023.pdf (libertyutilities.com)	
	25 Gailliand Country Edition 15	-	Can av 15 15:1	a) How many reportable distribution ignitions did Liberty experience in 2020? b) How many reportable distribution ignitions did Liberty experience in 2021?	a) One. b) Three.	0,11,2020	0, 13, 2023	0, 20, 2020	Nesponse oseespar (macrifactures)	
				c) How many reportable distribution ignitions did Liberty experience in 2022?	c) One.	24.442.22			CalAdvocates-Liberty-2023WMP-15_Liberty	
CalAdvocates	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 2022. Each ignition should be a row. For each ignition, please provide the following columns of data:	Refer to file: CalAdvocates-Liberty-2023WMP-15_Liberty Response Question 3.	6/14/2023	6/19/2023	6/20/2023	Response_06202023.pdf (libertyutilities.com)	
				a) Date b) Circuit ID number c) Line Type (Distribution or Transmission)					CalAdvocates-Liberty-2023WMP-15 Liberty	
CalAdvocates	15 CalAdvocates-Liberty-2023WMP-15	3	CalAdv-15-15.3	d) HETD Tier at the ignition location Please provide Liberty's Pre-submission 2023-2025 WMP Base Plan filed on March 6, 2023, with the OEIS per the 2023 WMP Guidelines and Schedule document. Including all attachments and associated supporting documents required for the Pre-submission 2023-2025 WMP Base Plan filing.	Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP pre-submission.	6/14/2023	6/19/2023	, ,	Response 06202023.pdf (libertyutilities.com) GPI Liberty 2023WMP 01 Liberty 1	WMP Pre-
Green Power Institute	1 GPI-Liberty-2023WMP-01	1	GPI-01-1.1	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	Response to Q01.: i. Standards including the height from ground and side of pole for installation are based on	3/6/2023	3/9/2023	3/8/2023	Response 03082023.pdf (libertyutilities.com)	Submission Administrative N/A
		1	OEIS-1-1.1	service territory and plans to add an additional four stations in 2023. In addition to Liberty's weather stations, there are dozens more RAWS and NWS weather stations within the service territory that are monitored through the MesoWest network".	existing equipment that occupy the pole as well as bucket truck accessibility. Additional installation guidelines are provided in supporting materials: "Attachment					
		1	OE13-1-1.1	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. ii. Provide the total number of stations that were serviced annually over the past three years, and the maintenance preformed on each station.	ii. None. iii. 2020: 10; 2021: 29; 2022: 29.				Data Daniert OFIS D MAND 2022 III 004 I libertu	
OEIS	1 OEIS-P-WMP_2023-LU-001			iii. Provide the total number of stations not serviced annually over the past three years. iv. Provide the estimated life span of each sensor and the replacement cycle for each Q02. Regarding Fuel Moisture Sampling:	iv. Refer to supporting materials: "Attachment Q01.ivLIB-Parts-Lifespan-Warranty." None Response to Q02.:	6/7/2023	6/12/2023	6/12/2023	Data Request OEIS-P-WMP_2023-LU-001_Liberty Response_07122023.pdf (libertyutilities.com)	8 Situational Awareness & Forecasting (8.3) 8.3.2
		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 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	i. Refer to: https://fuelmoisture.comii. Vegetation types:• Sagebrush at Meyers and Topaz (CA)				Data Request OEIS-P-WMP 2023-LU-001 Liberty	
OEIS	1 OEIS-P-WMP_2023-LU-001			entities (CAL FIRE LISES BLM etc.) Q03. Regarding Expulsion Fuse Replacements: a. On page 167 of Liberty's 2023 WMP, Liberty states:	• Manzanita at Ward Creek and Burton Creek (CA) Response to Q03.: a.	6/7/2023	6/12/2023	6/12/2023	Response 07122023.pdf (libertyutilities.com)	8 Situational Awareness & Forecasting (8.3) 8.3.2
				"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-	i. Liberty experienced four documented failures. ii. Liberty has experienced no ignitions associated with these fuses. h					
		3	OEIS-1-1.3	limiting fuse that Liberty has experienced, broken down by year, if applicable. b. On page 167 of Liberty's 2023 WMP, Liberty states:	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."					
				"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 lead to excessive heat buildup." i. Provide Liberty's current process for performing such continuous checks.	ii. Liberty plans to replace the fuses with ELF non-expulsion fuses. iii. 2018 2019				Data Barriert Offic B White 2000 W Co	
OEIS	1 OEIS-P-WMP_2023-LU-001			ii. Provide Liberty's plans to reduce ignition risk relating to current-limiting fuses that have been installed. iii. Provide the number of such current-limiting fuses Liberty has installed within its territory, as well as the number of fuses installed by year since 2018. Q04. Regarding QA/QC for Asset Inspections:	2020 2021 Response to Q04.:	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) 8.1.2
		4	OEIS-1-1.4	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	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					
OEIS	1 OEIS-P-WMP_2023-LU-001			timeline for establishment, and describe how Liberty plans to develop such pass rates.	performance, including establishing an Acceptable Quality Level ("AQL") and Conformance 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) 8.1.3
			05::5	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 HFTD 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 Q05.: a. i. The main cause includes limited resources being diverted to respond to storm events					
OFIC	1 OEIS D WIMD 2022 LIL 004	5	OEIS-1-1.5		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	6/7/2023	C 4 2 2 2 2 2	6/12/22	Data Request OEIS-P-WMP_2023-LU-001_Liberty Response_07122023 pdf (libertyutilities_com)	
OEIS	1 OEIS-P-WMP_2023-LU-001			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	and Q4 of 2023 in order to stay in compliance with GO timelines. Response to Q06.: a. Refer to supporting materials: "Attachment Q06.a. and Q06.fLiberty Fast Trip Data."	6///2023	b/12/2023	b/12/2023	Response 07122023.pdf (libertyutilities.com)	8 Grid Design, operations, and maintenance (8.1) 8.1.2
		6	OEIS-1-1.6	impacts has Liberty observed from use of fast trip settings so far? This should include data on the following: i. Number of outages that occurred while fast trip settings were enabled. ii. Number of customers affected by such outages.	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				1	
OEIS	1 OEIS-P-WMP_2023-LU-001			iii. Duration of outages that occurred while fast trip settings were enabled. iv. Customer interruption minutes associated with such outages.	fault indicators on circuits with SRP settings in order to aide 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)	8 Grid Design, operations, and maintenance (8.1) 8.1.8
				Q07. AlertWildfire Cameras 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 the fire season in both its 2021 (p. 83) and 2022 (p. 107) WMP submissions.	Response to Q07.: a. i. Liberty has partnered with the University of Nevada, Reno and the AlertWildfire camera					
		7	OEIS-1-1.7	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,	network to bring eight cameras in the Lake Tahoe Basin as well as the ability to access other existing cameras within Liberty's service territory. The process has included discussions with					
				including specific challenges or obstacles that has led to the postponement. iii. Provide the locations of the eight targeted locations that Liberty plans to sponsor.	AlertWildfire regarding the AlertWildfire annual operations services, scope of work, pricing and locations. The process has also included negotiating a service agreement for the targeted AlertWildfire cameras.				Data Request OEIS-P-WMP 2023-LU-001 Liberty	
OEIS	1 OEIS-P-WMP_2023-LU-001			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. Liberty has experienced challenges finalizing terms in the service agreement for the a. i. Liberty proposed a behind-the-meter battery program for medical baseline customers in its	6/7/2023	6/12/2023	6/12/2023	Response_07122023.pdf (libertyutilities.com)	8 Grid Design, operations, and maintenance (8.1) 8.3.4.3
				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?	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					
		1			2022 Liberty does not have suctioned in the first state of the state o			İ		
		1			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	
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.	baseline customers in 2023, 2024 and 2025. Nathan Poon a.	6/18/2023	6/21/2023	6/21/2023	Data Request OEIS-P-WMP 2023-LU-002 Liberty Response 07212023.pdf (libertyutilities.com)	N/A AFN Plan N/A
OEIS		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 inspections, including, but not limited to, the effectiveness of LiDAR to accurately calculate clearance distances and identify potential fall-in hazards? 	baseline customers in 2023, 2024 and 2025. Nathan Poon 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-				Bata Request OEIS-P-WMP 2023-LU-002 Liberty	N/A AFN Plan N/A
OEIS	2 OEIS-P-WMP_2023-LU-002 2 OEIS-P-WMP_2023-LU-002	2	OEIS-2-2.1 OEIS-2-2.2	 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 inspections, including, but not limited to, the effectiveness of LiDAR to accurately calculate clearance distances and identify potential fall-in hazards? i. If so provide a brief discussion of the results of that study/those studies 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. 	baseline customers in 2023, 2024 and 2025. Nathan Poon 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- hased inspections. Additional benefits have been realized due to the ability to perform these a. i. Liberty expects the independent review process to be inclusive of an assortment of SMEs in	6/18/2023			Response 07212023.pdf (libertyutilities.com)	N/A AFN Plan N/A N/A N/A N/A
OEIS		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 inspections, including, but not limited to, the effectiveness of LiDAR to accurately calculate clearance distances and identify potential fall-in hazards? i. If so, provide a brief discussion of the results of that study/those studies 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 	baseline customers in 2023, 2024 and 2025. Nathan Poon 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-hased inspections. Additional benefits have been realized due to the ability to perform these a. i. Liberty expects the independent review process to be inclusive of an assortment of SMEs in the fields of wildfire, terrain, and statistics. ii. The independent review process should encompass the data inputs and the statistical				Bata Request OEIS-P-WMP 2023-LU-002 Liberty	N/A AFN Plan N/A N/A N/A N/A

		a. Regarding Section 6.1.1, Indepen	ndent Review and Section 6.6.2, Model Controls, Design, and Review; what parts of Liberty's risk modeling capabi	lities a. After the risk modeling framework is fully implemented, Liberty will be able to run				
		will remain "in-house" after the Te	echnosylva model is fully implemented?	scenarios, develop model characteristics, and gain tactical insights from the risk modeling.				
		i. How are Technosylva's analytics	used to make risk mitigation decisions.	i. Technosylva's analytics will be inputs to the risk-based decision-making frameworks that				
		ii. Describe the roles and functions	Liberty's staff have in the process that uses vendor analytics to produce risk identification, prioritization, and	Liberty is developing in conjunction with Direxyon. The frameworks are under development				
		4 mitigation decisions.		and Liberty is identifying how the data and analytics will be used to inform decisions.				
		b. Besides Technosylva, what othe	r risk modeling vendors and subject matter experts will be involved in the on-going operation of Liberty's wildfire	risk ii. Liberty's staff are directly involved in decision making, collection and review of data				
		modeling, once fully implemented?		inputs/outputs, and the development of the overall risk framework.				
				b. Besides Technosylva, Liberty plans to continue to work with Reax and Direxyon on its			Data Request OEIS-P-WMP 2023-LU-002 Liberty	
OEIS	2 OEIS-P-WMP_2023-LU-002	OEIS-2-2.4		wildfire risk modeling. Liberty subject matter experts ("SMEs") will be involved in the on-	Nathan Poon	6/18/2023	6/21/2023 6/21/2023 Response 07212023.pdf (libertyutilities.com)	6 Risk Methodology and Assessment (6.1) 6.1.1
		a. Does Liberty plan on replacing ir	nstalled, non-exempt lightning/surge arrestors with CALFIRE exempt lightning/surge arrestors? If so, provide a time	eline a. Liberty has initiated its evaluation of exempt lightning/surge arresters. Liberty recently		•		
		for the project and yearly replacen	nent targets.	received sample materials and Liberty's Standards Committee plans to evaluate and				
				recommend construction standards for install prior to piloting the technology. There are				
		1		currently no timelines or yearly replacement targets set.				
							Data Request OEIS-P-WMP 2023-LU-003 Liberty	
OEIS	3 OEIS-P-WMP_2023-LU-003	OEIS-3-3.1			Nathan Poon	7/27/2023	8/1/2023 8/1/2023 Response 08012023.pdf (libertyutilities.com)	
		a. On page 55 of its WMP, Liberty s	states it has not conducted a wildfire risk assessment using the 85th percentile consequence calculation.	a.				
		i. Provide Liberty's expected timeli	ne for completion of this calculation, including an explanation of any factors contributing to potential delays in	i. Liberty expects to complete the wildfire risk assessment using the 85th percentile				
		calculating this risk score, if applica		consequence calculation prior to the 2024 WMP Update.				
		2						
							Data Request OEIS-P-WMP 2023-LU-003 Liberty	
OEIS	3 OEIS-P-WMP_2023-LU-003	OEIS-3-3.2			Nathan Poon	7/27/2023	8/1/2023 8/1/2023 Response 08012023.pdf (libertyutilities.com)	6 Risk Methodology and Assessment
	_	a. On page 36 of its WMP, Table 5-	2. Overview of Key Liberty Electrical Equipment, Overhead transmission and distribution lines (circuit miles), Liber	ty a. In responding to this question, Liberty identified an error in Table 5-2 of its 2023 WMP				
		states that it has 724.1 circuit mile	s in the HFTD and 35.6 circuit miles in the Non-HFTD with a Total of 759.7 circuit miles.	submission. The correct numbers for the Overhead transmission and distribution lines in				
		i. Provide Liberty's total circuit mile	es of Overhead Transmission Lines in the HFTD and Non-HFTD and Liberty's total circuit miles of Overhead	Table 5-2 should be 673.29 circuit miles in the HFTD and 34.72 circuit miles in the Non-HFTD,	,			
		Distribution Lines in the HFTD and	Non-HFTD.	with a total of 708.01 circuit miles. Please refer to the table below. (See response for table)				
							Data Request OEIS-P-WMP 2023-LU-003 Liberty	
OFIC	3 OEIS-P-WMP 2023-LU-003	OEIS-3-3.3			Nathan Poon	7/27/2023	8/1/2023 8/1/2023 Response 08012023.pdf (libertyutilities.com)	5 Electrical Infrastructure (5.2) 5.2