

Liberty 2023 WMP Discovery Log

Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question	Response	Requestor	Date Received	Final Date Due	Date Sent	Links	Number of Attachments	Attachment Links	NDA Required?	WMP Section	Category	Subcategory
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	1	CalAdv-01-1.1	Please provide a copy of each WMP-related document, submission, or report you submit to the Office of Energy Infrastructure Safety (Energy Safety) in 2023 that is related to your WMP. Provide the copy to Cal Advocates within one business day of the document's submission to Energy Safety. If you have submitted the document to Energy Safety in 2023 prior to this data request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this data request. This request is limited to materials or documents that (1) are related to work plans, initiative targets, risk models, risk spend efficiency (RSE) calculations, or WMP change orders, and (2) are provided to Energy Safety to provide additional details or context concerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP).	Refer to attachment: "2023-03-06_Liberty_2023_WMP-RO" for Liberty's 2023 WMP pre-submission, as submitted to OES 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 Kiewit platform, Liberty was not able to provide copies of these files until February 9, 2023.	Aaron Louie	2/24/2023	N/A	3/8/2023	CalAdvocates-Liberty-2023WMP-01_Liberty_Response-03082023.pdf@berkeleyliberty.com	1			WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	2	CalAdv-01-1.2	Please provide a copy of your WMP pre-submission within two business days of its submission to Energy Safety.	Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	N/A	3/8/2023	CalAdvocates-Liberty-2023WMP-01_Liberty_Response-03082023.pdf@berkeleyliberty.com	1			WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	3	CalAdv-01-1.3	Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but not limited to all PDFs, spatial data files, non-spatial data files, and confidential attachments) on the same business day that the documents is sent to Energy Safety.	Liberty attempted to provide CalAdvocates with copies of its Q4 2022 QDR files on February 1, 2023. However, due to technical issues with the CPUC Kiewit platform, Liberty was not able to provide copies of these files until February 9, 2023.	Aaron Louie	2/24/2023	N/A	3/8/2023	CalAdvocates-Liberty-2023WMP-01_Liberty_Response-03082023.pdf@berkeleyliberty.com	1			WMP Pre-Submission	Administrative	N/A
1	CalAdvocates	1	CalAdvocates-Liberty-2023WMP-01	4	CalAdv-01-1.4	Provide a copy of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the issuer of the discovery request. This includes: a) Confidential responses to WMP discovery requests issued by Energy Safety. b) Confidential responses to WMP discovery requests issued by other entities.	Liberty will provide CalAdvocates with copies of responses to 2023 WMP discovery requests made by Energy Safety and other entities.	Aaron Louie	2/24/2023	N/A	3/8/2023	CalAdvocates-Liberty-2023WMP-01_Liberty_Response-03082023.pdf@berkeleyliberty.com	1			WMP Pre-Submission	Administrative	N/A
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	1	CalAdv-02-2.1	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that were completed since January 1, 2022, and that examined any programs, initiatives, or strategies described in your 2022 WMP Update.	For Vegetation Management programs, Liberty performs a post-work documentation review, or desktop review, of 100% of vegetation management invoices in order to confirm accuracy. If satisfactory, the invoices are approved in Liberty's work management system. If not satisfactory, the invoice and supporting documents are returned to the contractor for correction. The following files related to Liberty's Post-Work Verification Procedure ("PWV") desktop review is included in the Supporting Materials email for this data request response sent to CalAdvocates through the CPUC Kiewit platform: "2022 Liberty Internal Desktop Invoice Audit Tracker". Additionally, Liberty system arborists perform post-work field verifications to confirm adherence to work specifications. This includes a review to determine whether (1) adequate clearance was 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 (O&M) program in 2022. Liberty plans to provide this information to CalAdvocates by March 17, 2023.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	CalAdvocates-Liberty-2023WMP-02_Liberty_Response-03102023.pdf@berkeleyliberty.com	8			Grid Design, operations, and maintenance (8-1)	Vegetation Management (8-2)	8.1.6, 8.2.5
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	2	CalAdv-02-2.2	Provide an Excel table of all defects in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns: a) Associated circuit name b) Defect type c) Description of defect d) 2022 WMP initiative (from your 2022 WMP update) associated with defect e) Date that the defect was identified f) Date that the defect was corrected g) If the defect has not yet been corrected as of the issuance date of this data request, a brief explanation. h) Priority level of corresponding corrective tag i) Geographic latitude of defect in decimal degrees, truncated to seven decimal places j) Geographic longitude of defect in decimal degrees, truncated to seven decimal places	Liberty did not receive any Notices of Defects from Energy Safety in 2022.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	CalAdvocates-Liberty-2023WMP-02_Liberty_Response-03102023.pdf@berkeleyliberty.com	6			Grid Design, operations, and maintenance (8-1)	Vegetation Management (8-2)	8.1.6, 8.2.5
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	3	CalAdv-02-2.3	Provide an Excel table of all violations in the year 2022 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns: a) Associated circuit name b) Violation type c) Description of violation d) 2022 WMP initiative (from your 2022 WMP update) associated with violation e) Date that the violation was identified f) Date that the violation was corrected g) If the violation has not yet been corrected as of the issuance date of this data request, a brief explanation h) Priority level of corresponding corrective tag i) Geographic latitude of violation in decimal degrees, truncated to seven decimal places j) Geographic longitude of violation in decimal degrees, truncated to seven decimal places	Liberty did not receive any Notices of Violations from Energy Safety in 2022.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	CalAdvocates-Liberty-2023WMP-02_Liberty_Response-03102023.pdf@berkeleyliberty.com	12			Notices of Violation and Defect		N/A
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	4	CalAdv-02-2.4	Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns: a) Circuit name b) Circuit ID number c) Total circuit miles d) Circuit miles in Non-HFTD Areas e) Circuit miles in Other HFTD f) Circuit miles in HFTD Tier 2 g) Circuit miles in HFTD Tier 3 h) Circuit voltage i) Circuit SAIDI (System Average Interruption Duration Index) for 2021 j) Circuit SAIDI (System Average Interruption Duration Index) for 2022 k) Circuit SAIFI (System Average Interruption Frequency Index) for 2021 l) Circuit SAIFI (System Average Interruption Frequency Index) for 2022 m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2021 n) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022 o) Total customer-minutes of de-energization on the circuit due to PPS events in 2021 (sum of customer-minutes across all PPS events). p) Total customer-minutes of de-energization on the circuit due to PPS events in 2022 (sum of customer-minutes across all PPS events). q) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. r) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2022. s) Number of trees that were worked on for EWM in Non-HFTD in 2021 t) Number of trees that were worked on for EWM in Non-HFTD in 2022 u) Number of trees that were worked on for EWM in Other HFTD in 2021 v) Number of trees that were worked on for EWM in Other HFTD in 2022 w) Number of trees that were worked on for EWM in HFTD Tier 2 in 2021 x) Number of trees that were worked on for EWM in HFTD Tier 2 in 2022 y) Number of trees that were worked on for EWM in HFTD Tier 3 in 2021 z) Number of trees that were worked on for EWM in HFTD Tier 3 in 2022	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q1 - Distribution.	Aaron Louie	2/24/2023	3/10/2023	3/10/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03102023.pdf@berkeleyliberty.com	1			Notices of Violation and Defect		N/A
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	1	CalAdv-03-1.1	Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns: a) Circuit name b) Circuit ID number c) Total circuit miles d) Circuit miles in Non-HFTD Areas e) Circuit miles in Other HFTD f) Circuit miles in HFTD Tier 2 g) Circuit miles in HFTD Tier 3 h) Circuit voltage i) Total customer-minutes of de-energization on the circuit due to PPS events in 2021 (sum of customer-minutes across all PPS events). j) Total customer-minutes of de-energization on the circuit due to PPS events in 2022 (sum of customer-minutes across all PPS events). k) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021. l) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2022. m) Number of support structures replaced in Non-HFTD in 2021 n) Number of support structures replaced in Non-HFTD in 2022 o) Number of support structures replaced in Other HFTD in 2021 p) Number of support structures replaced in Other HFTD in 2022 q) Number of support structures replaced in HFTD Tier 2 in 2021 r) Number of support structures replaced in HFTD Tier 2 in 2022 s) Number of support structures replaced in HFTD Tier 3 in 2021 t) Number of support structures replaced in HFTD Tier 3 in 2022 u) Miles of LIDAR inspection in Non-HFTD in 2021 v) Miles of LIDAR inspection in Non-HFTD in 2022 w) Miles of LIDAR inspection in Other HFTD in 2021 x) Miles of LIDAR inspection in Other HFTD in 2022 y) Miles of LIDAR inspection in HFTD Tier 2 in 2021 z) Miles of LIDAR inspection in HFTD Tier 2 in 2022	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q2 - Transmission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	5,6			Electrical Infrastructure		5.2, 6.4.2
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	2	CalAdv-03-1.2	Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns: a) Circuit name b) Circuit ID number c) Total circuit miles d) Circuit miles removed or decommissioned in Non-HFTD Areas e) Circuit miles removed or decommissioned in Other HFTD f) Circuit miles removed or decommissioned in HFTD Tier 2 g) Circuit miles removed or decommissioned in HFTD Tier 3 h) Reason(s) for removal or decommissioning.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q3 - Distribution Removals.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	1			Line Removal		8.1.2.9
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	3	CalAdv-03-1.3	Provide an Excel table of all transmission circuits existing as of January 1, 2022, that were removed or decommissioned in 2022, either partially or entirely (as rows). This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns: a) Circuit name b) Circuit ID number c) Circuit miles removed or decommissioned in Non-HFTD Areas d) Circuit miles removed or decommissioned in Other HFTD e) Circuit miles removed or decommissioned in HFTD Tier 2 f) Circuit miles removed or decommissioned in HFTD Tier 3	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q4 - Transmission Removals.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	1			Line Removal		8.1.2.9
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	4	CalAdv-03-1.4	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced where you performed work in 2022. a) Vegetation management (VM) b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2022. Work performed in 2022 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	8			Line removal		8.1.2.9
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	5	CalAdv-03-1.5	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced how work in 2022 was sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2022. Work performed in 2022 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	6			Risk Scoring		N/A
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	6	CalAdv-03-1.6	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced where you plan to perform work in 2023. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	6			Risk Scoring		N/A
3	CalAdvocates	3	CalAdvocates-Liberty-2023WMP-03	7	CalAdv-03-1.7	For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced where you plan to perform work in 2023. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced where it performed work in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	6			Risk Scoring		N/A

ID	Initiative	Sub-Initiative	Priority	Description	Task Details	Status/Notes	Date	Date	Date	Response	Category	Status	Other
					For each WMP initiative listed below, please state which and how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2023 will be sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid reconfiguration f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative sub-sections in Section 8 of Liberty's 2023 WMP pre-submission.				CalAdvocates.Liberty.2023WMP-03_Liberty_Response_0242023.pdf (libertyutilities.com)	Risk Scoring	N/A	
3	CalAdvocates-Liberty-2023WMP-03		8	For each WMP initiative listed below, please state which and how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2024. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid reconfiguration f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets.	Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize where it performs future work in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative sub-sections in Section 8 of Liberty's 2023 WMP pre-submission.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates.Liberty.2023WMP-03_Liberty_Response_03292023.pdf (libertyutilities.com)	Risk Scoring	N/A	
6	CalAdvocates-Liberty-2023WMP-06		1	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 completed after 2023, please include the project and report the work that 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 b) Program c) Circuit ID number d) Circuit segment name or ID number (if the project affects more than one circuit segment, please identify each one) e) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2023-2025 WMP filing f) The expected or actual start date of the project g) The expected completion date of the project h) Length (in circuit miles) of covered conductor to be installed in 2023 i) Length (in circuit miles) of underground conductor to be installed in 2023 j) Length (in circuit miles) of overhead conductor to be permanently removed in 2023 and replaced by underground conductor (note that this may differ slightly from the previous part due to differing overhead and underground routes) k) Length (in circuit miles) of overhead conductor to be permanently removed in 2023 and replaced with covered conductor or undergrounded l) Length (in circuit miles) of any other type of system hardening project to be installed in 2023.	Refer to tab "2023" in supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty_Response_04262023.pdf" in supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty_Response_04262023.pdf" in supporting file: "CalAdvocates-Liberty-2023WMP-06_Liberty_Response_04262023.pdf"	Aaron Louie	2/24/2023	4/19/2023	4/26/2023	CalAdvocates.Liberty.2023WMP-06_Liberty_Response_04262023.pdf (libertyutilities.com)	Grid Design, operations, and maintenance (8.1)	8.1.2	1

CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	8	CalAdv-09-8	<p>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 context:</p> <p>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?</p> <p>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 2023-2025 WMP cycle?</p> <p>c) Does Liberty use estimates of expected risk reduction to determine the sequence of mitigation work conducted on its top-risk circuits?</p> <p>d) If the answer to part (c) is no, why not?</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-09_Liberty_Response_06012023.pdf (libertyutilities.com)</p>	6	Risk Methodology and Assessment	6.4
CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	9	CalAdv-09-9	<p>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 supplements Table 6-7 with information about planned wildfire mitigation measures on each circuit during the 2023-2025 WMP cycle. Specifically, the table should address the following:</p> <p>a) Brief description of grid design and system hardening work planned for wildfire mitigation purposes in 2023-2025 (for example: 2.0 miles of undergrounding, 1.0 miles of covered conductor installation, and installation of 3 new reclosers on this circuit).</p> <p>b) The month and year when Liberty began project planning for the work identified in part (a).</p> <p>c) The month and year when Liberty began construction or plans to begin construction of the work identified in part (a).</p> <p>d) The month and year when Liberty currently plans to complete the project(s) identified in part (a).</p> <p>e) Brief description of other wildfire mitigation measures planned in 2023-2025.</p> <p>f) Timeline for completion of the work identified in the previous part.</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-09_Liberty_Response_06012023.pdf (libertyutilities.com)</p>	6	Risk Methodology and Assessment	6.4
CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	10	CalAdv-09-10	<p>Pages 104-105 of Liberty's WMP states:</p> <p>(i) In late January 2023, Liberty signed a formal agreement with Dreyer to pilot its asset risk decision-making solution to be incorporated, in part, in this WMP. If the pilot is successful, the pilot asset type and production-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. Please describe the goals, analytical methods, and duration of the aforementioned pilot project by Dreyer.</p> <p>(ii) Describe the success criteria for the aforementioned Dreyer pilot project - in other words, what criteria is Liberty using to evaluate the success of the asset risk decision-making solution?</p> <p>(iii) Will the aforementioned pilot be completed by the end of 2023?</p> <p>(iv) If the answer to subpart (c) is "no," please state when Liberty expects the pilot to be complete.</p> <p>(v) Please describe each specific way that Liberty anticipates utilizing the Dreyer tools to inform its 2023-2025 wildfire mitigation strategy.</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-09_Liberty_Response_06012023.pdf (libertyutilities.com)</p>	6	Risk Methodology and Assessment	6.7
CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	11	CalAdv-09-11	<p>Page 107 of Liberty's WMP states "Liberty's strategy development for this WMP did not utilize wildfire risk scores developed by Reax."</p> <p>a) Does Liberty plan on utilizing the wildfire risk scores developed by Reax to help plan future decisions regarding wildfire mitigation?</p> <p>b) If the answer to part (a) above is yes, when does Liberty plan on utilizing the wildfire risk scores developed by Reax?</p> <p>c) If the answer to part (a) above is no, please describe how Liberty's current approach will change with the utilization of the wildfire risk scores by Reax.</p> <p>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 mitigation.</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-09_Liberty_Response_06012023.pdf (libertyutilities.com)</p>	7	Wildfire Mitigation Strategy Development	
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	1	CalAdv-10-1	<p>On page 174 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. Liberty's 2023 target is to inspect 703 miles. Please respond to the following:</p> <p>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 (the annual Liberty was able to complete in 2022).</p> <p>c) Explain Liberty's process, procedure, or protocol for determining annual asset inspection targets for each type of inspection Liberty conducts.</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)</p>	8	Grid Design, operations, and maintenance (8.1)	8.1.3
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	2	CalAdv-10-2	<p>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:</p> <p>a) How many individual asset inspections did Liberty conduct QA/QC on in 2022?</p> <p>b) Are both transmission and distribution detailed inspections included in the 0.0044% figure?</p> <p>c) If the answer to part (b) above is "no," please answer which type of detailed inspections is included in the 0.0044% figure.</p> <p>d) If the answer to part (b) above is "yes," please breakdown each type of detailed inspections is included in the 0.0044% figure.</p> <p>e) Please provide an Excel table of the QA/QC checks that Liberty completed on detailed asset inspections in 2022. Please list in the Excel sheet the following information in columns: the date of the original detailed inspection, the date QA/QC was performed, what type of asset was inspected, the result of the QA/QC check, and any follow-up remediation or inspections that Liberty took as a result of the QA/QC check.</p> <p>f) State the basis for Liberty's target of performing QA/QC on 0.0050% of detailed asset inspections in 2022.</p> <p>g) Explain why Liberty missed the 0.0050% QA/QC target in 2022.</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)</p>	8	Grid Design, operations, and maintenance (8.1)	8.1.3
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	3	CalAdv-10-3	<p>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 inspected by three-party inspectors. Minimal differences were noted by the three-party inspectors, who found only very minor infractions during the inspections. Differences were noted as follows:</p> <p>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).</p> <p>b) If these two targets refer to different types of QA/QC activities, please provide a thorough description of each activity that identifies the similarities and differences.</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)</p>	8	Grid Design, operations, and maintenance (8.1)	8.1.6
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	4	CalAdv-10-4	<p>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 inspected by three-party inspectors. Minimal differences were noted by the three-party inspectors, who found only very minor infractions during the inspections. Differences were noted as follows:</p> <p>a) How many three-party QA/QC checks were completed on detailed asset inspections in 2022?</p> <p>b) Of the checks included in the answer to part (a), how many checks noted "differences" between the initial inspections and the third-party QA/QC inspections?</p> <p>c) Please describe and provide examples of the "very minor infractions."</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)</p>	8	Grid Design, operations, and maintenance (8.1)	8.1.6
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	5	CalAdv-10-5	<p>On page 183 of its WMP, Liberty states:</p> <p>As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and internal crews are working to expedite the process. Liberty also states that it "will halt its detailed inspections in order to catch up with its open maintenance work orders and resume detailed inspections in 2024."</p> <p>Please respond to the following:</p> <p>a) On what exact date in 2023 did Liberty halt its detailed inspections, as referenced in the above quote?</p> <p>b) What is Liberty's 2023 target for detailed asset inspections?</p> <p>c) How many detailed asset inspections has Liberty completed in 2023?</p> <p>d) Does Liberty intend to resume detailed asset inspections on a specific date in 2024 or will the resumption timing depend on how quickly Liberty is able to eliminate its backlog of open work orders? Please explain your response.</p> <p>e) Is Liberty currently in compliance with General Orders 95 and 165 regarding the frequency of detailed asset inspections?</p> <p>f) If Liberty conducts no detailed inspections for the remainder of 2023, will Liberty be in compliance with General Orders 95 and 165 on January 1, 2024?</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)</p>	8	Grid Design, operations, and maintenance (8.1)	8.1.7
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	6	CalAdv-10-6	<p>On page 183 of its WMP, Liberty states:</p> <p>As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and internal crews are working to expedite the process. Liberty also states that it "will halt its detailed inspections in order to catch up with its open maintenance work orders and resume detailed inspections in 2024."</p> <p>Please respond to the following:</p> <p>a) Explain Liberty's rationale for halting detailed inspections in 2023 to reduce the number of open work orders on Liberty's system, as referenced in the quote above.</p> <p>b) Explain the prudence of halting detailed asset inspections until 2024.</p> <p>c) Estimate the potential safety risk caused by not conducting detailed inspections of Liberty infrastructure in 2023.</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)</p>	8	Grid Design, operations, and maintenance (8.1)	8.1.7
CalAdvocates	10	CalAdvocates-Liberty-2023WMP-10	7	CalAdv-10-7	<p>a) Describe Liberty's current staffing resources allocated to each of the following items under asset management, including but not limited to:</p> <p>1. Inspections</p> <p>2. Maintenance</p> <p>3. Resolution of open work orders and any other items not listed above.</p> <p>b) Please explain how Liberty's current staffing is sufficient or not sufficient to comply with regulatory requirements for asset management and inspection?</p> <p>c) How many open (unfiled) staff or contractor positions does Liberty have in the area of asset management and inspections? Please explain your response.</p> <p>d) How many filed staff or contractor positions in the area of asset management and inspections would Liberty consider to be "fully staffed"?</p> <p>e) Does Liberty intend to increase staffing (either with directly employed personnel or contractors) to increase capacity to perform asset management and inspections?</p> <p>f) If the answer to part (e) is yes, will the increase be temporary or permanent?</p> <p>g) If the answer to part (e) is yes, will the increase be based on creating new positions or filling current vacancies?</p>	Talal Harashheh	5/26/2023	6/1/2023	6/1/2023	<p>CalAdvocates-Liberty-2023WMP-10_Liberty_Response_06022023.pdf (libertyutilities.com)</p>	N/A	N/A	N/A
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	1	CalAdv-11-1.1	<p>Page 109 of Liberty's WMP states that "Liberty sought to separately strategize future risk model refinements and approaches by onboarding new vendors to help develop a formal risk model decision framework for Liberty."</p> <p>a) Are the "new vendors" that Liberty refers to above IBM and Dreyer?</p> <p>b) If the answer to part (a) above is no, please provide the name of the vendors and a description of how Liberty is utilizing each vendor to develop its formal risk model decision framework.</p>	Talal Harashheh	6/1/2023	6/6/2023	6/6/2023	<p>Liberty_Response_to_DR_CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)</p>	7	Risk Evaluation (7.1)	7.1.1
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	2	CalAdv-11-1.2	<p>Pages 109-110 discuss Liberty's risk evaluation process and how Liberty utilizes Figure 7-1: Risk Identification and Analysis for WMP. With this context:</p> <p>a) What is the total number of "discussion points" that Liberty will plot on Figure 7-1 while conducting its risk evaluation process?</p> <p>b) Please list all of the "discussion points" that Liberty will plot on Figure 7-1 as part of the risk identification and analysis.</p> <p>c) Please provide any documents generated from Liberty's risk evaluation process related to the Topaz circuit.</p> <p>d) Please provide any documents generated from Liberty's risk evaluation process related to the Muller circuit.</p> <p>e) Please provide any documents generated from Liberty's risk evaluation process related to the Meyers circuit.</p>	Talal Harashheh	6/1/2023	6/6/2023	6/6/2023	<p>Liberty_Response_to_DR_CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)</p>	7	Risk Evaluation (7.1)	7.1.1
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	3	CalAdv-11-1.3	<p>Pages 110-117 of Liberty's WMP identify the Topaz circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context:</p> <p>a) Does Liberty have any system hardening mitigation work planned in 2023 for the Topaz circuit listed above? If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit.</p> <p>b) 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.</p> <p>c) Does Liberty have any system hardening mitigation work planned in 2024 for the Topaz circuit listed above?</p> <p>d) If the answer to part (c) above is yes, please identify the mitigation work planned for 2024.</p>	Talal Harashheh	6/1/2023	6/6/2023	6/6/2023	<p>Liberty_Response_to_DR_CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)</p>	7	Risk Evaluation (7.1)	7.1.3
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	4	CalAdv-11-1.4	<p>Pages 116-117 of Liberty's WMP identify the Muller circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context:</p> <p>a) Does Liberty have any system hardening mitigation work planned in 2023 for the Muller circuit listed above?</p> <p>b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit.</p> <p>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.</p> <p>d) Does Liberty have any system hardening mitigation work planned in 2024 for the Muller circuit listed above?</p> <p>e) If the answer to part (e) above is yes, please identify the mitigation work planned for 2024.</p>	Talal Harashheh	6/1/2023	6/6/2023	6/6/2023	<p>Liberty_Response_to_DR_CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)</p>	7	Risk Evaluation (7.1)	7.1.3
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	5	CalAdv-11-1.5	<p>Pages 116-117 of Liberty's WMP identify the Meyers circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context:</p> <p>a) Does Liberty have any system hardening mitigation work planned in 2023 for the Meyers circuit listed above?</p> <p>b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit.</p> <p>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.</p> <p>d) Does Liberty have any system hardening mitigation work planned in 2024 for the Meyers circuit listed above?</p> <p>e) If the answer to part (e) above is yes, please identify the mitigation work planned for 2024.</p>	Talal Harashheh	6/1/2023	6/6/2023	6/6/2023	<p>Liberty_Response_to_DR_CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)</p>	7	Risk Evaluation (7.1)	7.1.3
CalAdvocates	11	CalAdvocates-Liberty-2023WMP-11	6	CalAdv-11-1.6	<p>Page 127 of Liberty's WMP states "Liberty is currently evaluating wildfire risk results in consultation with its analytics team. Liberty has developed an interim mitigation strategy for its vegetation portfolio and plans to expand this strategy to incorporate assets in the future." When does Liberty anticipate it will have expanded its interim mitigation strategy to incorporate asset management measures, as referenced in the quote?</p>	Talal Harashheh	6/1/2023	6/6/2023	6/6/2023	<p>Liberty_Response_to_DR_CalAdvocates-Liberty-2023WMP-11.pdf (libertyutilities.com)</p>	7	Risk Evaluation (7.1)	7.1.4

OEIS		3	OEIS-P-WMP_2023-LU-003
OEIS		3	OEIS-P-WMP_2023-LU-003
OEIS		4	OEIS-P-WMP_2023-LU-004

2

3

1

OEIS-3-3.2	<p>a. On page 55 of its WMP, Liberty states it has not conducted a wildfire risk assessment using the 85th percentile consequence calculation.</p> <p>i. Provide Liberty's expected timeline for completion of this calculation, including an explanation of any factors contributing to potential delays in calculating this risk score, if applicable.</p>	i. Liberty expects to complete the wildfire risk assessment using the 85th percentile consequence calculation prior to the 2024 WMP Update.	Nathan Poon	7/27/2023	8/1/2023	8/1/2023	Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08012023.pdf@iberty.vtlibes.com
OEIS-3-3.3	<p>a. On page 36 of its WMP, Table 5-2, Overview of Key Liberty Electrical Equipment, Overhead Transmission and Distribution Lines (circuit miles), Liberty states that it has 274.1 circuit miles in the HTD and 55.6 circuit miles in the Non-HTD with a Total of 228.7 circuit miles.</p> <p>i. Provide Liberty's total circuit miles of Overhead Transmission Lines in the HTD and Non-HTD and Liberty's total circuit miles of Overhead Distribution Lines in the HTD and Non-HTD.</p>	<p>a. In responding to this question, Liberty identified an error in Table 5-2 of its 2023 WMP submission. The correct numbers for the Overhead transmission and distribution lines in Table 5-2 should be 673.29 circuit miles in the HTD and 34.72 circuit miles in the Non-HTD, with a total of 708.01 circuit miles. Please refer to the table below. (See response for table)</p>	Nathan Poon	7/27/2023	8/1/2023	8/1/2023	Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08012023.pdf@iberty.vtlibes.com
OEIS-4-1.1	<p>a. On page 169 of Liberty's 2023 WMP, footnote 53 states that Liberty does not have a separate program for transmission inspections. Liberty's 94 miles of transmission lines are included in the distribution inspection program.</p> <p>i. Describe how transmission inspections are included in the distribution inspection program.</p> <p>ii. Describe any differences with the transmission inspection process compared to distribution, as applicable.</p> <p>b. For transmission detailed inspections:</p> <p>i. Are overhead transmission detailed inspections performed on a 5-year cycle? If so, describe this process, including any timeline differences for HTD. If not, explain why.</p> <p>ii. Are approximately 20% of the transmission line miles inspected each year, or is the entirety of the transmission system inspected in one year, then again five years later?</p> <p>iii. Are transmission line detailed inspections executed using the same checklists and/or manuals as distribution detailed inspections? If so, how does Liberty account for transmission-specific equipment?</p> <p>iv. Are there different inspector qualifications required for transmission line inspections vs distribution line inspections? If so, describe such qualifications.</p> <p>c. For transmission intrusive pole inspections:</p> <p>i. Are transmission intrusive pole inspections performed on a 10-year cycle? If so, describe this process, including any timeline differences for HTD. If not, explain why.</p> <p>ii. Are approximately 50% of the transmission poles inspected each year, or are the entirety of the transmission system poles inspected in one year, then again years later?</p> <p>iii. Are transmission pole intrusive inspections executed using the same checklists and/or manuals as distribution intrusive inspections? If so, how does Liberty account for transmission-specific equipment?</p> <p>d. For transmission patrol inspections:</p> <p>i. Are transmission patrol inspections completed annually? If so, describe this process, including any timeline differences for HTD. If not, explain why.</p> <p>ii. Are transmission line patrol inspections executed using the same checklists and/or manuals as distribution patrol inspections? If so, how does Liberty account for transmission-specific equipment?</p>	<p>a. Transmission inspections are treated the same as distribution inspections and are scheduled as such.</p> <p>ii. There are no differences.</p> <p>b.</p> <p>i. Transmission inspections are on a 5-year cycle, same as distribution. Currently, there are no differences for HTD zones. Liberty stays compliant with the GO365 timelines for overhead inspections. ii. Transmission is inspected during 2 of the 5-year cycle. North Lake Tahoe transmission in one year, and South Lake Tahoe transmission in another.</p> <p>ii. Yes, the same checklists are used for transmission as distribution.</p> <p>iv. No.</p> <p>c.</p> <p>i. Yes, intrusive pole inspections are on a 10-year cycle. Liberty uses a 3rd party contractor to perform these inspections and any urgent pole replacements are completed as soon as possible. Currently, there are no differences for HTD zones. Liberty stays compliant with the GO365 timelines for overhead inspections.</p> <p>ii. Yes, the transmission is rolled into the 10-year schedule with the distribution circuits.</p> <p>iii. Yes, same checklists.</p> <p>d.</p> <p>i. Patrol inspections are completed on transmission annually except for years where those transmission lines are on the detailed inspection schedule. Currently, there are no differences for HTD zones. Liberty stays compliant with the GO365 timelines for overhead inspections.</p> <p>ii. Yes, same checklists.</p>	Nathan Poon	8/18/2023	8/23/2023	8/23/2023	Data Request OEIS-P-WMP_2023-LU-004_Liberty_Response_08232023.pdf@iberty.vtlibes.com

									6 Risk Methodology and Assessment	
									5 Electrical Infrastructure (5.2)	5.2
									6 Grid Design, operation, and maintenance (6.3)	6.3.1