

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 score 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 validations 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 (AASIP) 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	6			8	Grid Design, operations, and maintenance (8-1) Vegetation Management (8-2)	8.1.6, 8.2.5
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	2	CalAdv-02-2.2	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			8	Grid Design, operations, and maintenance (8-1) Vegetation Management (8-2)	8.1.6, 8.2.5
2	CalAdvocates	2	CalAdvocates-Liberty-2023WMP-02	3	CalAdv-02-2.3	Provide an Excel table of all 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	6			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	6			12	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	6			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 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 Q3 - Distribution Removals.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	6			5,6	Electrical Infrastructure	5.2, 6.4.3
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 g) Reason(s) for removal or decommissioning.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-03_Liberty Response Questions 1-4," Tab Q4 - Transmission Removals.	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty_Response-03292023.pdf@berkeleyliberty.com	6			8	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	6			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			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			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 performed 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			6	Risk Scoring	N/A

				<p>For each WMP initiative listed below, please state which and how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2023 will be sequenced. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets 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</p> <p>For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2024. a) VM b) Covered conductor installation c) Undergrounding d) Distribution pole replacement e) Grid sectionalization f) Detailed inspections of distribution assets g) Detailed inspections of transmission assets h) Aerial inspections of distribution assets i) Aerial inspections of transmission assets j) LIDAR inspections of distribution assets k) LIDAR inspections of transmission assets</p>	<p>Liberty did not perform overall wildfire risk scores at the circuit or circuit segment level that influenced how work was sequenced in 2023. Work performed in 2023 was planned using separate risk analysis, compliance requirements, and/or subject matter expertise. Liberty is evaluating the results of differing wildfire risk assessments at the circuit and/or circuit segment level to plan and prioritize how future work is sequenced in 2024. For additional information, refer to Section 6.7, Section 7.1.3, Section 7.1.4, and individual initiative subsections in Section 8 of Liberty's 2023 WMP pre-submission.</p>											
CalAdvocates		3	CalAdvocates-Liberty-2023WMP-03	8	CalAdv-03-2.8	<p>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.</p>	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty-Response-02492003.pdf	6	Risk Scoring		N/A	
CalAdvocates		3	CalAdvocates-Liberty-2023WMP-03	9	CalAdv-03-3.9	<p>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.</p>	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-03_Liberty-Response-03292003.pdf	6	Risk Scoring		N/A	
CalAdvocates		3	CalAdvocates-Liberty-2023WMP-03	10	CalAdv-03-3.10	<p>For each WMP initiative for which you forecast capital expenditures in 2023 to be at least two times actual capital expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.</p>	Aaron Louie	2/24/2023	3/24/2023	3/29/2023	CalAdvocates-Liberty-2023WMP-04_Liberty-Response-Questions-1-4-Tab-Response-1	6	Risk Scoring		N/A	
CalAdvocates		4	CalAdvocates-Liberty-2023WMP-04	1	CalAdv-04-4.1	<p>For each WMP initiative for which you forecast capital expenditures in 2024 to be at least two times actual capital expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.</p>	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty-Response-03312023.pdf		WMP Financials	N/A	N/A	
CalAdvocates		4	CalAdvocates-Liberty-2023WMP-04	2	CalAdv-04-4.2	<p>For each WMP initiative for which you forecast operating expenditures in 2023 to be at least two times actual operating expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.</p>	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty-Response-03312023.pdf		WMP Financials	N/A	N/A	
CalAdvocates		4	CalAdvocates-Liberty-2023WMP-04	3	CalAdv-04-4.3	<p>For each WMP initiative for which you forecast operating expenditures in 2024 to be at least two times actual operating expenditures in 2022, please provide: a) The name of the initiative as it is identified in your 2023-2025 WMP b) The WMP initiative number in Table 11 of your 2023-2025 WMP c) The name of the initiative as it is identified in your 2022 WMP Update d) The WMP initiative number in Table 12 of your 2022 WMP Update e) An explanation for the projected increase.</p>	Aaron Louie	2/24/2023	3/24/2023	3/31/2023	CalAdvocates-Liberty-2023WMP-04_Liberty-Response-03312023.pdf		WMP Financials	N/A	N/A	
CalAdvocates		4	CalAdvocates-Liberty-2023WMP-04	4	CalAdv-04-4.4	<p>a) An explanation for the projected increase. b) No. 39/N/A/C) N/A</p>	Aaron Louie	2/24/2023	3/24/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-04_Liberty-Response-03312023.pdf		WMP Financials	N/A	N/A	
CalAdvocates		5	CalAdvocates-Liberty-2023WMP-05	1	CalAdv-05-5.1	<p>Provide an Excel table of all distribution circuit-segments that traverse HTD areas (i.e., the segment has greater than zero circuit-miles in HTD) existing as of January 1, 2023. The Excel table should list each such circuit-segment as a row and include the following information in separate columns: for items (b) and (c), 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-HTD Areas g) Overhead circuit-miles on the circuit-segment in HTD Tier 2 h) Overhead circuit-miles on the circuit-segment in HTD Tier 3 i) Underground circuit-miles on the circuit-segment in non-HTD Areas j) Underground circuit-miles on the circuit-segment in HTD Tier 2 k) Underground circuit-miles on the circuit-segment in HTD Tier 3 l) Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing m) Consequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing n) Total wildfire risk score(s) for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Insert additional columns if needed o) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you are using for your 2023-2025 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 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.</p>	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty-Response-Question-2			6	N/A	N/A
CalAdvocates		5	CalAdvocates-Liberty-2023WMP-05	2	CalAdv-05-5.2	<p>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), 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 (d) through (g) of the previous question.</p>	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty-Response-04102023.pdf			6	N/A	N/A
CalAdvocates		5	CalAdvocates-Liberty-2023WMP-05	3	CalAdv-05-5.3	<p>Please fill out the attached spreadsheet, CalAdvocates-Liberty-2023WMP-05_Attachment Tab 1, requesting information regarding your asset inspections in 2023.</p>	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty-Response-04102023.pdf	1		6	N/A	N/A
CalAdvocates		5	CalAdvocates-Liberty-2023WMP-05	4	CalAdv-05-5.4	<p>In response to Data Request CalAdvocates-Liberty-2023WMP-05_ Question 7, March 24, 2023, Liberty stated, "Liberty's QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 2022 after Quarter 1 and Quarter 2 detailed inspections are completed." a) Please summarize the results of Liberty's asset inspection QA/QC reviews in 2022. b) Please summarize the results of Liberty's asset inspection QA/QC reviews in 2023. c) Did Liberty's asset inspection QA/QC reviews in 2022 lead to any corrective actions or improvements, such as performing re-inspections of certain assets, revising inspection protocols, or changing training for inspectors? d) If the answer to part (c) is yes, please describe the actions that Liberty is taking as a result of its asset inspection QA/QC reviews. e) If the answer to part (c) is no, please explain why not.</p>	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty-Response-04102023.pdf	1		8	Grid Design, operations, and maintenance (B.1)	8.1.6
CalAdvocates		5	CalAdvocates-Liberty-2023WMP-05	5	CalAdv-05-5.5	<p>In response to Data Request CalAdvocates-Liberty-2023WMP-05_ Question 7, March 24, 2023, Liberty stated, "Liberty's QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 2022 after Quarter 1 and Quarter 2 detailed inspections are completed." The following questions refer to the QA/QC processes for asset inspections that Liberty implemented in Quarter 3 and Quarter 4 of 2022: a) Please provide a sample of 5 completed "Appendix A - Program Manager Quarterly Review Acknowledgment" forms. b) Please provide a sample of 5 completed "Appendix B - Senior Manager Annual Review Acknowledgment" forms. c) Please provide a sample of 5 completed "Appendix C - Third Party Inspector" forms that were completed by third party contractors.</p>	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty-Response-04102023.pdf	1		8	Grid Design, operations, and maintenance (B.1)	8.1.6
CalAdvocates		5	CalAdvocates-Liberty-2023WMP-05	6	CalAdv-05-5.6	<p>Please segment Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 of 2022, which reports asset-related corrective notifications on electric circuits that were open at the end of the quarter. Add the following information in separate columns: a) Name of the associated circuit b) ID number of the associated circuit c) Geographic latitude in decimal degrees, truncated to seven decimal places d) Geographic longitude in decimal degrees, truncated to seven decimal places e) Object/damage code or other description of defect</p>	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty-Response-04102023.pdf	1		8	Grid Design, operations, and maintenance (B.1)	8.1.6
CalAdvocates		5	CalAdvocates-Liberty-2023WMP-05	7	CalAdv-05-5.7	<p>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 56, Rule 38? b) 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? d) If the answer to part (b) is yes, under what circumstances do you conduct re-inspections?</p>	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty-Response-04102023.pdf	1		8	Grid Design, operations, and maintenance (B.1)	8.1.6
CalAdvocates		5	CalAdvocates-Liberty-2023WMP-05	8	CalAdv-05-5.8	<p>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 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 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 d) The vegetation management initiative involved in the original work e) A brief description of the safety issue involved.</p>	Aaron Louie	2/24/2023	3/30/2023	4/10/2023	CalAdvocates-Liberty-2023WMP-05_Liberty-Response-04102023.pdf	1		8	Grid Design, operations, and maintenance (B.1)	8.1.6
CalAdvocates		6	CalAdvocates-Liberty-2023WMP-06	1	CalAdv-06-6.1	<p>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 not replaced with covered conductor or undergrounded l) Length (in circuit miles) of any other type of system hardening project to be installed in 2024 (if this is greater than zero, please describe the type of system hardening project)</p>	Aaron Louie	2/24/2023	4/19/2023	4/26/2023	CalAdvocates-Liberty-2023WMP-06_Liberty-Response-Questions-2-and-3			8	Vegetation Management and Inspections (B.2)	8.2.7
CalAdvocates		6	CalAdvocates-Liberty-2023WMP-06	2	CalAdv-06-6.2	<p>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 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 2024 i) Length (in circuit miles) of underground conductor to be installed in 2024 j) Length (in circuit miles) of overhead conductor to be permanently removed in 2024 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 2024 and not replaced with covered conductor or undergrounded l) Length (in circuit miles) of any other type of system hardening project to be installed in 2024 (if this is greater than zero, please describe the type of system hardening project)</p>	Aaron Louie	2/24/2023	4/19/2023	4/26/2023	CalAdvocates-Liberty-2023WMP-06_Liberty-Response-Questions-2-and-3			8	Grid Design, operations, and maintenance (B.1)	8.1.2
CalAdvocates		6	CalAdvocates-Liberty-2023WMP-06	3	CalAdv-06-6.3	<p>For each of your 2023-2025 WMP system hardening initiatives, please provide disaggregated information related to expenditures and circuit miles (inserted in the attached table, CalAdvocates-Liberty-2023WMP-06_Attachment Tab 1. Add extra columns as needed. Note: for the purposes of this question, "the removed" refers to conductors that are permanently removed without a replacement - for instance, as part of a remote grid project. This should be understood as identical to part (B) of questions 2 and 3 above.</p>	Aaron Louie	2/24/2023	4/19/2023	4/26/2023	CalAdvocates-Liberty-2023WMP-06_Liberty-Response-Question-4			8	Grid Design, operations, and maintenance (B.1)	8.1.2
CalAdvocates		6	CalAdvocates-Liberty-2023WMP-06	4	CalAdv-06-6.4		Aaron Louie	2/24/2023	4/19/2023	4/26/2023	CalAdvocates-Liberty-2023WMP-06_Liberty-Response-Question-4	1		8	Grid Design, operations, and maintenance (B.1)	8.1.2

				Regarding your PPS circuit modeling capabilities: a) Please describe your present circuit modeling capabilities with regard to PPS decision-making ("PPS circuit modeling capabilities"), including what level of granularity they are able to determine how circuit hardening efforts or other changes to a line segment will affect PPS thresholds. b) Please describe any improvements to the present PPS circuit modeling capabilities that you expect to implement in 2023. c) Please describe any improvements to the present PPS circuit modeling capabilities that you expect to implement in 2024. d) Please describe the expected state of your PPS circuit modeling capabilities at the conclusion of the 2023-2025 WMP cycle.	a) Liberty's 2023 WMP section 6.2 includes the baseline PPS risk analyses and assessment performed at the beginning of this year by circuit. The PPS risk decision-making framework has not been developed and the model inputs currently do not incorporate grid hardening efforts and a static study. The decision-making framework would have to consider current PPS methods affecting each circuit and any current PPS mitigation controls in place would also need to be factored in and calculated separately to support any proposed changes to PPS thresholds. This would result in a more refined baseline PPS baseline risk assessment. Liberty does not have plans to track the performance of PPS mitigations nor improve its current PPS circuit model capabilities. Measuring PPS risk reduction would require tracking circuit segments with PPS mitigations observed such as covered conductors, installed Sensitive Relays, grid controls to divert electricity flow to other lines, and Microgrids at the specific GIS location in order to monitor and assess current PPS thresholds and force outage events during fire season. Current data limitations and root causes of outage events are not monitored at the specific asset level. b) See response to Question 5, part (a). c) See response to Question 5, part (a). d) Liberty's 2023 WMP pre-submission Section 6.7 and Table 6-9 includes Liberty risk assessment improvement plan for 2023-2025, including Liberty's data ingestion of asset and vegetation performance tracking with real time data analytics to effectively measure risk reduction it relates to wildfire risk. Liberty could also integrate PPS mitigation measures as part of its enterprise risk management solution.	Aaron Louie	2/24/2023	4/19/2023	4/26/2023	CalAdvocatesLiberty-2023WMP-06_Liberty_response_04262023.pdf (libertyutilities.com)					
CalAdvocates	6	CalAdvocates-Liberty-2023WMP-06	5	CalAdv-06-6.5	Identify any ignitions in 2022 associated with assets where you had an existing corrective notification at the time of the ignition. Please provide a spreadsheet listing each such ignition (as rows) with the following information in separate columns: a) Unique Ignition ID b) Date of ignition c) Cause of ignition d) Type of asset associated with the ignition e) Acres burned f) Number of structures burned if any g) Number of injuries associated with ignition if any h) Asset ID of asset associated with ignition i) Circuit ID number of circuit associated with ignition j) Notification number(s) for the existing corrective notification on the asset in question k) Priority level of the existing corrective notification on the asset in question	Liberty did not have any ignitions in 2022 associated with assets where it had an existing corrective notification at the time of the ignition	Aaron Louie	2/24/2023	4/19/2023	4/26/2023	CalAdvocatesLiberty-2023WMP-06_Liberty_response_04262023.pdf (libertyutilities.com)		6	Risk Analysis Framework (6.2)	N/A
CalAdvocates	6	CalAdvocates-Liberty-2023WMP-06	6	CalAdv-06-6.6	Page 55 of Liberty 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 Resilient Wildfire Risk Program. 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) 2023-2025 WMP Technical Guidelines, Liberty did not have enough time to analyze the intersection of the SVI and the 85th percentile of wildfire consequence risk according to Liberty's updated wildfire risk modeling results. b) Refer to Section 6 of Liberty's 2023 WMP.	Aaron Louie	2/24/2023	4/19/2023	4/26/2023	CalAdvocatesLiberty-2023WMP-06_Liberty_response_04262023.pdf (libertyutilities.com)		8	Grid Design, operations, and maintenance (8.1)	8.1.2
CalAdvocates	7	CalAdvocates-Liberty-2023WMP-07	1	CalAdv-07-7.1	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 33 subdivisions were categorized by CAL FIRE as "Very High" Fire Hazard Severity Zones. a) Do Liberty's PPS and wildfire risk analyses consider whether a location has no secondary egress or limited egress? b) If the answer to part (a) is yes, please explain how your risk analyses address limited egress. c) What actions did Liberty take during the 2020-2022 WMP cycle to reduce wildfire risk for the subdivisions mentioned in the quote above? d) What actions does Liberty plan to take during the 2023-2025 WMP cycle to reduce wildfire risk for the subdivisions mentioned in the quote above?	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 actions completed during the 2020-2022 WMP cycle in limited egress areas, refer to supporting materials: "CalAdvocates-Liberty-2023WMP-07_Liberty Response Question 3." d) During the 2023-2025 WMP cycle, Liberty will continue to perform mitigation work across its service territory. Mitigation actions will be driven by the decision-making processes and risk analyses detailed in Liberty's 2023 WMP and in subsequent WMP submissions. Liberty may consider incorporating limited egress into wildfire risk analysis in future years so that the risk can be quantified.	Talal Harahsheh	5/18/2023	5/23/2023	5/23/2023	CalAdvocatesLiberty-2023WMP-07_Liberty_response_05232023.pdf (libertyutilities.com)		5	Community Values at Risk (5.4)	5.4.3.2
CalAdvocates	7	CalAdvocates-Liberty-2023WMP-07	2	CalAdv-07-7.2	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 alleviate the problem noted above. 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 inform homeowners and renters in its service territory when O&M activities are to be expected?	a) Liberty uses a variety of methods for notifying customers of O&M activities: • Door hangers • Sign boards • Mailed letters or postcards • Social media posts • Email • Bill inserts • Everbridge text notification • Door to door in person notification attempts • Phone call notification attempts b) Customer Service Representatives (CSRs) are required to verify customer information including telephone number, email, and mailing address. This expectation is reviewed through the Call Quality Program in which "verifies customer information according to Liberty standards" is one component of the spreadsheet. c) Refer to Response 3a.	Talal Harahsheh	5/18/2023	5/23/2023	5/23/2023	CalAdvocatesLiberty-2023WMP-07_Liberty_response_05232023.pdf (libertyutilities.com)		5	Community Values at Risk (5.4)	5.4.3.3
CalAdvocates	7	CalAdvocates-Liberty-2023WMP-07	3	CalAdv-07-7.3	Page 60 of Liberty's WMP states, "Liberty is currently working with the [Tahoe Regional Planning Agency] to update an existing memorandum of 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 to part (a) above is "no," please describe the status of developing an updated memorandum of understanding and the projected timeline to execute it.	a) Customer Service Representatives (CSRs) are required to verify customer information including telephone number, email, and mailing address. This expectation is reviewed through the Call Quality Program in which "verifies customer information according to Liberty standards" is one component of the spreadsheet. b) Refer to Response 3a.	Talal Harahsheh	5/18/2023	5/23/2023	5/23/2023	CalAdvocatesLiberty-2023WMP-07_Liberty_response_05232023.pdf (libertyutilities.com)		5	Community Values at Risk (5.4)	5.4.5
CalAdvocates	7	CalAdvocates-Liberty-2023WMP-07	4	CalAdv-07-7.4	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 in the 2023-2025 WMP Technical Guidelines that Liberty has not yet conducted. b) For each item listed in response to part (a), identify the resource constraint(s) that hindered completion prior to Liberty's 2023 WMP submission. c) For each item listed in response to part (a), state when Liberty anticipates completing it.	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 analyses provided in the guidelines. b) OEIS released final 2023-2025 WMP Technical Guidelines on December 6, 2022. In late January 2023, Liberty executed an agreement with Technosys to provide wildfire risk analysis relating to "Wildfire Risk Reduction Model" ("WRM"). Liberty received its first analytics package with the results from WRM in late February 2023. Additionally, in late January 2023, Liberty signed a formal agreement with Dreyfus to pilot its asset risk decision making solution to be incorporated, in part, in Liberty's 2023 WMP. Liberty's 2023 WMP submission was submitted to OEIS on March 6, 2023. This time was a limiting factor in completing additional analysis contained in the OEIS 2023-2025 WMP Technical Guidelines. c) Liberty anticipates completing additional analysis contained in the OEIS 2023-2025 WMP Technical Guidelines during the 2023-2025 WMP cycle.	Talal Harahsheh	5/18/2023	5/23/2023	5/23/2023	CalAdvocatesLiberty-2023WMP-07_Liberty_response_05232023.pdf (libertyutilities.com)		5	Community Values at Risk (5.4)	5.4.5
CalAdvocates	7	CalAdvocates-Liberty-2023WMP-07	5	CalAdv-07-7.5	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"? b) What data does Liberty currently maintain or collect to measure physical vulnerability? c) When Liberty eventually incorporates the factor "social vulnerability" within future wildfire risk analyses, what attributes/characteristics would Liberty utilize to define "social vulnerability"? d) What data does Liberty currently maintain or collect to measure social vulnerability?	a) Liberty has not determined all attributes/characteristics it will utilize to define physical vulnerability. Liberty considers Medical Baseline (MBL) and some Access and Functional Needs (AFN) customers as physically vulnerable. In future wildfire risk analysis, Liberty can assign weights to different customer categories (i.e., AFN/MBL, Commercial, Residential, Critical Facilities) based on physical vulnerability. b) Liberty maintains a list of MBL customers and self-identified AFN customers. c) Liberty has not determined all attributes/characteristics it will utilize to define social vulnerability. Liberty considers some AFN customers as socially vulnerable (i.e., CARE customers). Additionally, 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 Resilient Wildfire Risk Program. 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. d) Liberty maintains a list of self-identified AFN customers. Liberty also analyzed the Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry's Social Vulnerability Index dataset.	Talal Harahsheh	5/18/2023	5/23/2023	5/23/2023	CalAdvocatesLiberty-2023WMP-07_Liberty_response_05232023.pdf (libertyutilities.com)		6	Risk Methodology and Assessment	6
CalAdvocates	7	CalAdvocates-Liberty-2023WMP-07	6	CalAdv-07-7.6	Please provide an Excel sheet listing of each sustained outage that was caused by equipment failure for the period from 2020 to 2022 in any HTD 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. b) Name of the circuit affected. c) Date of the outage. d) Cause of the outage. e) Conductor type at the location where the fault occurred (e.g., overhead [OH] bare conductor, overhead covered conductor, underground [UG] cable). f) For all equipment failure outages, please state the specific type of failure (i.e., OH transformer failure, cross arm, UG transformer failure, cable failure, conductor failure etc.). g) The outage duration in minutes. h) Total number of customers impacted.	Refer to supporting file: "CalAdvocates-Liberty-2023WMP-08_Liberty Response Question 1."	Talal Harahsheh	5/18/2023	5/23/2023	5/23/2023	CalAdvocatesLiberty-2023WMP-08_Liberty_response_05232023.pdf (libertyutilities.com)		6	Risk Methodology and Assessment	6.2
CalAdvocates	8	CalAdvocates-Liberty-2023WMP-08	1	CalAdv-08-8.1	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 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?	a) With the final 2023 WMP technical guidelines issued approximately three months prior to 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. c) See Response 3b.	Talal Harahsheh	5/18/2023	5/23/2023	5/25/2023	CalAdvocatesLiberty-2023WMP-08_Liberty_response_05252023.pdf (libertyutilities.com)		8	Grid Design, operations, and maintenance (8.1)	
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) In which year of this WMP cycle does Liberty plan on being able to include physical vulnerability in its future risk modeling process?	a) Liberty's current fire science consultant, Dr. Chris Luttwalder, 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. b) Liberty intends to incorporate physical vulnerability into its risk modeling when generalized and validated fragility curves, or comparable approaches, have been developed and validated by the fire science community. c) See Response 2b.	Talal Harahsheh	5/26/2023	6/1/2023	6/1/2023	CalAdvocatesLiberty-2023WMP-09_Liberty_response_06012023.pdf (libertyutilities.com)		6	Risk Methodology and Assessment	6.2
CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	2	CalAdv-09-9.2	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. 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?	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. b) Liberty plans to incorporate coping capacity in 2024 and report on this enhancement in its future WMP filings. c) See Response 3b.	Talal Harahsheh	5/26/2023	6/1/2023	6/1/2023	CalAdvocatesLiberty-2023WMP-09_Liberty_response_06012023.pdf (libertyutilities.com)		6	Risk Methodology and Assessment	6.2
CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	3	CalAdv-09-9.3	Page 70 of Liberty's WMP states the following factors are included as part of Liberty's wildfire risk analysis: Equipment/assets, Topography, Weather, 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 c) Weather d) Vegetation e) Climate change f) Assets at risk g) Fire ignition and spread	a) Equipment/assets: GIS data are used to construct an ignition buffer surrounding Liberty's equipment and assets for use in fire spread modeling. b) Topography: Topography is an input to Liberty's fire spread modeling. c) Weather: Weather is 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. f) Assets at risk: Assets at risk are considered when quantifying fire consequence. g) Fire Ignition and Spread: A fire spread model that considers fire ignition and spread forms the basis of Liberty's fire risk modeling.	Talal Harahsheh	5/26/2023	6/1/2023	6/1/2023	CalAdvocatesLiberty-2023WMP-09_Liberty_response_06012023.pdf (libertyutilities.com)		6	Risk Methodology and Assessment	6.2
CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	4	CalAdv-09-9.4	Page 70 of Liberty's WMP states the following factors are included as part of Liberty's wildfire risk analysis: • Equipment/assets, • Topography, • Weather, • Vegetation, • Climate change, • Assets at risk, and • Fire ignition and spread. a) For each factor listed above, does Liberty have any review procedures in place to verify the accuracy of changes in the quantification of risk from one year to the next? b) If the answer to part (a) above is yes, please provide a description of how Liberty updates the quantification of risk for each factor listed each year. c) Please provide what data sources Liberty uses to verify change in the quantification of risk for each factor listed above.	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 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 developed by authoritative federal and state agencies. • Fire ignition and spread: Liberty uses a peer-reviewed open-source fire spread model for modeling ignition and spread. This same model is also used to forecast the spread of most large fires in the United States in real time under funding from the US Forest Service with its accuracy continuously being assessed and improved. b) N/A. c) N/A.	Talal Harahsheh	5/26/2023	6/1/2023	6/1/2023	CalAdvocatesLiberty-2023WMP-09_Liberty_response_06012023.pdf (libertyutilities.com)		6	Risk Methodology and Assessment	6.2
CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	5	CalAdv-09-9.5	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 the Technical Guidelines." a) Please identify the constraint(s) that hindered the incorporation of burn probability from fires caused by sources other than utilities.	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.	Talal Harahsheh	5/26/2023	6/1/2023	6/1/2023	CalAdvocatesLiberty-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 83 of Liberty's WMP states "Overall utility risk is calculated by circuit from wildfire risk and PPS risk, with an 80% weight to wildfire risk and 20% to PPS risk." a) Please explain how Liberty arrived at the above-mentioned specific weighting of wildfire risk and PPS risk. b) Has Liberty consulted with any agencies, universities, research groups, or other entities on the calculation of the above-mentioned weighting of wildfire risk and PPS risk? Please list those entities if so.	The sentence "Overall utility risk is calculated by circuit from wildfire risk and PPS risk, with an 80% weight to wildfire risk and 20% to PPS risk" contains a typographical error. It should read "Overall utility risk is calculated by summing wildfire risk and PPS 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	6/1/2023	CalAdvocatesLiberty-2023WMP-09_Liberty_response_06012023.pdf (libertyutilities.com)		6	Risk Methodology and Assessment	6.2
CalAdvocates	9	CalAdvocates-Liberty-2023WMP-09	7	CalAdv-09-9.7	Page 83 of Liberty's WMP states "Overall utility risk is calculated by circuit from wildfire risk and PPS risk, with an 80% weight to wildfire risk and 20% to PPS risk." a) Please explain how Liberty arrived at the above-mentioned specific weighting of wildfire risk and PPS risk. b) Has Liberty consulted with any agencies, universities, research groups, or other entities on the calculation of the above-mentioned weighting of wildfire risk and PPS risk? Please list those entities if so.	The sentence "Overall utility risk is calculated by summing wildfire risk and PPS 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	6/1/2023	CalAdvocatesLiberty-2023WMP-09_Liberty_response_06012023.pdf (libertyutilities.com)		6	Risk Methodology and Assessment	6.2

CA/Adv	CA/Adv-Liberty-2023WMP-11	7	7	CA/Adv-11-11.7	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? 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.	a) No. b) N/A c) The abovementioned risk-based decision-making process is not complete. Liberty used risk-based principles and tools (e.g., Reax risk map) to inform decision-making.	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty Response to DR CA/Advocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.1.4
CA/Advocates	11	8	8	CA/Adv-11-11.8	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 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. a) Describe the success criteria for the abovementioned IBM Maximo project – in other words, what criteria is Liberty using to evaluate the accuracy of the asset and vegetation risk scores produced by IBM's Maximo platform? b) When (i.e., month and year) will the abovementioned platform be complete and operational? c) Please describe each specific way that Liberty anticipates utilizing the abovementioned IBM work management platform to inform its 2023-2025 wildfire mitigation strategy.	a) Liberty plans to have an initial risk-informed decision-making framework for overhead assets by August 2023. b) Liberty does not know the timeline for when all risk studies will be delivered. Liberty's wildfire risk modeling is an ongoing process that is informed by the results of current risk studies (i.e., Technology modeling results, Reax modeling results, Dwyer outputs, OES risk modeling guidelines, and collaborative discussions with stakeholders through processes such as the Risk Modeling Working Group). c) Beginning in 2023, Liberty uses the Reax fire risk polygons and subject matter expert knowledge to target specific areas that have the highest wildfire risk or previous reliability or safety issues. d) Liberty will use the Reax fire risk polygons, its critical risk assessment, and subject matter expert knowledge to target specific areas that have the highest wildfire risk or previous reliability or safety issues.	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty Response to DR CA/Advocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.2.2
CA/Advocates	11	9	9	CA/Adv-11-11.9	On pgs. 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 assessment and modeling • Grid design and system hardening • Asset management and inspections • Vegetation management and inspections • Situational awareness and forecasting • Other spending Please provide the breakdown in tabular format for each year, showing all the costs amounting to: a) \$33,333,000 for 2020, b) \$33,333,000 for 2021, and c) \$50,132,000 for 2022.	a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS on March 8, 2023. b) See response 1a. c) See response 1b.	Talal Harahsheh	6/1/2023	6/6/2023	6/6/2023	Liberty Response to DR CA/Advocates-Liberty-2023WMP-11.pdf (libertyutilities.com)	7	Risk Evaluation (7.1)	7.2.3
CA/Advocates	12	1	1	CA/Adv-12-12.1	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 expenditures including at least the following categories: • Risk assessment and modeling • Grid design and system hardening • Asset management and inspections • Vegetation management and inspections • Situational awareness and forecasting • Other spending Please provide the breakdown in tabular format for each year, showing all the costs amounting to: a) \$48,393,000 for 2023, b) \$54,180,000 for 2024, and c) \$55,078,000 for 2025.	a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS on March 8, 2023. b) See response 2a. c) See response 2b.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-12_Liberty-Response_06092023.pdf (libertyutilities.com)	4	Proposed Expenditures (4.3)	
CA/Advocates	12	2	2	CA/Adv-12-12.2	On pgs. 201-202 of its WMP, Liberty provides Table B-18: "Liberty Vegetation Inspections Targets by Year." Please explain why the row describing Liberty's Vegetation Targets by Year for the Initiative Activity "Program – UDM" is blank.	The blank row in Table B-18 is a formatting error on the table carrying over from page 201 to page 202. There should only be one row for "Vegetation Management Inspection Program – UDM" and the relative activity row was inadvertently left up due to the page break.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-12_Liberty-Response_06092023.pdf (libertyutilities.com)	4	Proposed Expenditures (4.3)	
CA/Advocates	12	3	3	CA/Adv-12-12.3	On p. 209 of its WMP, Liberty provides Figure B-4: "Liberty VM Inspection Overview." a) Please describe what steps Liberty takes if a customer refuses access to his or her property for either a vegetation inspection or a vegetation maintenance activity. b) Please provide any internal protocols, handbooks, or other documents that describe the actions Liberty takes if a customer refuses access to his or her property for either a vegetation inspection or a vegetation maintenance activity.	a) Liberty VM field personnel are unable to perform their job function due to a customer refusing access, the refusal shall be documented in the VM system and on the Refusal Form document. If possible, the vegetation condition and vicinity to facilities should be photographed for reference and record keeping. Liberty VM field personnel (VM Inspectors, VM workers) communicate the refusal as soon as possible to their immediate supervisor for resolution. Every effort should be made by the supervisor to contact the property owner, or authorized agent to understand the basis of the refusal and determine an appropriate course of action toward resolution and work completion. Any contact or attempt made to resolve the refusal shall be documented by the employee initiating resolution. The supervisor may need to consult with Liberty VM for support if resolution is unobtainable or for approval if there is a request outside of the normal scope of work that would facilitate completing work. Should attempts to reach a resolution with the refusing party be unsuccessful, Liberty may need to take further action by reserving existing land or easement rights to be able to perform vegetation work. Liberty VM should attempt to exercise land and easement rights in order to perform the required work within the appropriate mitigation timeline. Liberty may be required to involve jurisdictional law enforcement to facilitate completing the required work necessary to comply with applicable laws and regulations. Law enforcement should be notified, or their presence requested, to facilitate gaining access or completing vegetation management work as needed. Liberty shall notify its legal Department and Corporate Security team to advise on all hostile customers and take the necessary action to facilitate completing required work within the appropriate mitigation timeline through a court order or temporary restraining order. b) Liberty is in the process of developing its VM-06, Notification and Refusal Policy which provides guidance on interfacing with landowners including communication and notification processes, management of refusal scenarios, conflict resolution strategies, and the documentation of these processes through the lifecycle of identification and mitigation of required Vegetation Management work.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-12_Liberty-Response_06092023.pdf (libertyutilities.com)	8	Vegetation Management and Inspections (B.2)	8.2.1.2
CA/Advocates	12	4	4	CA/Adv-12-12.4	On p. 243 of its WMP, Liberty provides Table B-31: "Fast 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. 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.	a) Age refers to the date the work order was first created. b) Liberty defines how work orders are prioritized based on risk and how mitigation timeframes are identified based on observed field conditions in Section 8.2.6 of the 2023 WMP (page 240 - 241) and per its VM-05, Vegetation Threat Procedure. Liberty intends to complete work orders and mitigate identified tree conditions within the timelines specified in its VM-05 based on the priority level of assigned to the vegetation work order at the time of inspection and describes this process on page 240-241 of the 2023 WMP. c) Of the 2,588 open work orders reported, 210 work orders remain open as of June 9th, 2023. 164 of the open work orders are on Capital improvement projects that is coordinated with Capital construction schedules. This work is currently in progress. 35 work orders on the "Safer" file resilient right-of-way project had maintenance deferred in late 2022 due to slow conditions and are planned to be completed in 2023. Liberty is in the process of evaluating the remaining 11 work orders to determine priority and requirements beyond standard operating procedures. d) Liberty expects to complete the remaining 164 work orders by the end of the third quarter in 2023.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-12_Liberty-Response_06092023.pdf (libertyutilities.com)	8	Vegetation Management and Inspections (B.2)	8.2.2
CA/Advocates	12	5	5	CA/Adv-12-12.5	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	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-12_Liberty-Response_06092023.pdf (libertyutilities.com)	8	Vegetation Management and Inspections (B.2)	8.2.6
CA/Advocates	13	1	1	CA/Adv-13-13.1	On p. 314 of its WMP, Liberty states: "NV Energy (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." a) NV Energy the sole provider of electricity to Liberty's circuit? 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 circuit by NV Energy. d) Has Liberty ever experienced any de-energizations (including, but not limited to PSPP) because of loss of electricity supply from NV Energy transmission lines? e) If the answer to part (d) is yes, please state the date of each such outage since the beginning of 2018. f) If the answer to part (d) is yes, for each such outage since the beginning of 2018, please elaborate on the duration, number of customers affected, and actions that Liberty took during the outage.	a) Yes. b) N/A. c) To the extent possible, Liberty will follow PSPP protocols regarding communications if an NV Energy PSPP event impacts Liberty's power lines and customers. d) Liberty objects to this request as vague and ambiguous with regard to the term "de-energizations," "encompass," "unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objections, Liberty responds as follows: Yes. e) Liberty objects to this request as vague and ambiguous with regard to the term "de-energizations," "encompass," "unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objections, Liberty responds as follows: Refer to file: CA/Advocates-Liberty-2023WMP-13_Liberty Response Question 2. f) Liberty objects to this request as vague and ambiguous with regard to the term "de-energizations," "encompass," "unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objections, Liberty responds as follows: Refer to file: CA/Advocates-Liberty-2023WMP-13_Liberty Response Question 2.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-13_Liberty-Response_06092023.pdf (libertyutilities.com)	2	Emergency Preparedness (B.4)	8.4.2
CA/Advocates	13	2	2	CA/Adv-13-13.2	On p. 162 of its WMP, Liberty states "[T]hese programs, in particular Liberty's SRP program, may reduce the need for PSPP in certain areas." a) Please explain how Liberty's SRP program may reduce the need for PSPP in certain areas. b) Please describe the decision-making process for a situation in which Liberty anticipates PSPP conditions but decides to use its SRP program instead. c) Please list at dates in 2022 when Liberty anticipated PSPP conditions but used its SRP program instead.	a) Liberty's SRP program is not currently impacting Liberty's PSPP protocols. In 2023, Liberty is working with University of Nevada, Reno (UNR) to develop the SRP settings and discuss how this could impact PSPP protocols. If SRP settings are set sensitive enough, then the ignition risk from a fire could be low enough to act in place of a PSPP. The settings that Liberty is currently planning to use for the SRP program are not currently proven to be low enough to make this call. Liberty will be evaluating this topic with UNR and other major utilities in 2023. b) Liberty's SRP program is not currently impacting Liberty's PSPP protocols, and thus Liberty does not have an established decision-making process to utilize SRP as an alternative to PSPP. c) None.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-13_Liberty-Response_06092023.pdf (libertyutilities.com)	8	Emergency Preparedness (B.4)	8.4.3.2
CA/Advocates	13	3	3	CA/Adv-13-13.3	Please provide a description of the weather conditions in which Liberty enables its SRP program. b) Please identify the months or seasons in which Liberty enables its SRP program. c) Please provide relevant work documents or procedures that Liberty uses related to enabling its SRP program.	a) Various weather conditions influence the SRP decision process, including wind conditions, temperature conditions, and moisture content. b) The area of Liberty service territory and weather conditions in any given year or month affect whether SRP will be enabled. Based on historical conditions, SRP settings would be enabled in the summer and early fall when the moisture content is low and temperatures and wind conditions can be high. c) Liberty does not have any work documents directly related to SRP.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-13_Liberty-Response_06092023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (B.1)	8.1.2.6
CA/Advocates	13	4	4	CA/Adv-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." a) In Liberty's response to CA/Advocates-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 20144.00 for the Circuit Meyers 3302. Please explain if the pilot SRP program began in 2021 or if Liberty used a different program for the de-energization. b) There are values listed in Liberty's response to CA/Advocates-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 pilot. c) Please describe the scope, planned duration, goals, and success metrics of the 2022 Fast Trip / SRP pilot project. d) Other than expanding which circuits may use SRP settings, as shown in Appendix C, may there be "2023 Restorative Relay Profile Program" on pdf, a 476, 2023, how has Liberty modified its SRP program since 2021? For example, have the speed or sensitivity of the fast-trip settings changed? e) Please provide a list of the circuits included in Liberty's SRP program in 2022.	a) Liberty utilized a different program in 2021. Prior to the SRP program pilot in 2022, Liberty utilized "wildfire mode" settings which removes reclosing. The SRP program takes this a step further by removing reclosing and lowering the trip settings to a number that impacts relay coordination and reduces incident energy on fault conditions, which in turn reduces ignition risk. b) In 2022, Liberty utilized a mix of SRP settings and "wildfire mode" settings because the pilot program took time to develop, install, and commission settings. c) The goals in 2022 were to pilot the SRP program. This entailed working with UNR to research these settings and benchmark them against other major utilities. Liberty enabled SRP settings and began to track associated reliability metrics. With a small sample size, Liberty has not observed a noticeable decrease in reliability for the circuits on which SRP has been implemented. d) Liberty did not utilize SRP settings in 2021. Since the SRP program was started in 2022, there have not been any significant changes to the "speed or sensitivity" of the fast trip settings. Liberty plans to review the load seen by the overcurrent protection devices (a recloser or a substation circuit breaker) on the SRP circuits on an annual basis. This load data is then used to engineer a sensitive relay profile that aims to limit the incident energy developed on a fault event, thus reducing ignition risk, while also not "nuisance" tripping for events that are not actual faults. e) Meyers 3300 and Toyah 1261.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-13_Liberty-Response_06092023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (B.1)	8.1.2.6
CA/Advocates	13	5	5	CA/Adv-13-13.5	Liberty's response to question 8 of data request CA/Advocates-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. b) Is Liberty pursuing an alternative solution for the same purpose? If so, please explain.	a) In its evaluation of whether to move forward with the proposed solution from IBM, Liberty considered factors including: • Cost • System compatibility, particularly the risk of moving forward with the solution prior to SAP implementation later this year; and • The ability to operationalize model outputs. b) Yes, Liberty is in the process of exploring alternative solutions. c) The number of ignitions reported in Liberty's QDR for Q1 and Q2 of 2022 is incorrect. Liberty's QDR for Q1 of 2022 correctly reports the total number of distribution ignitions in 2020 and 2021 as four.	Talal Harahsheh	6/6/2023	6/9/2023	6/9/2023	CA/Advocates-Liberty-2023WMP-13_Liberty-Response_06092023.pdf (libertyutilities.com)	8	Grid Design, operations, and maintenance (B.1)	8.1.2.6
CA/Advocates	14	1	1	CA/Adv-14-14.1	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 2022 correctly reports the total number of distribution ignitions in 2020 and 2021 as four.	Talal Harahsheh	6/8/2023	6/13/2023	6/13/2023	CA/Advocates-Liberty-2023WMP-14_Liberty-Response_06132023.pdf (libertyutilities.com)			
CA/Advocates	15	1	1	CA/Adv-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? c) How many reportable distribution ignitions did Liberty experience in 2022?	a) One. b) Three. c) One.	Talal Harahsheh	6/14/2023	6/19/2023	6/20/2023	CA/Advocates-Liberty-2023WMP-15_Liberty-Response_06202023.pdf (libertyutilities.com)			
CA/Advocates	15	2	2	CA/Adv-15-15.2	a) How many reportable distribution ignitions did Liberty experience in 2020? b) How many reportable distribution ignitions did Liberty experience in 2021? c) How many reportable distribution ignitions did Liberty experience in 2022?	a) One. b) Three. c) One.	Talal Harahsheh	6/14/2023	6/19/2023	6/20/2023	CA/Advocates-Liberty-2023WMP-15_Liberty-Response_06202023.pdf (libertyutilities.com)			

					4	<p>a. Regarding Section 6.1.1, Independent Review and Section 6.4.2, Model Controls, Design, and Review; what parts of Liberty's risk modeling capabilities will remain "in-house" after the Technosys model is fully implemented?</p> <p>i. How are Technosys's analytics used to make risk mitigation decisions?</p> <p>ii. Describe the roles and functions Liberty's staff have in the process that uses vendor analytics to produce risk identification, prioritization, and mitigation decisions.</p> <p>b. Besides Technosys, what other risk modeling vendors and subject matter experts will be involved in the on-going operation of Liberty's wildfire risk modeling, once fully implemented?</p>	<p>a. After the risk modeling framework is fully implemented, Liberty will be able to run scenarios, develop model characteristics, and gain tactical insights from the risk modeling.</p> <p>i. Technosys's analytics will be inputs to the risk-based decision-making frameworks that Liberty is developing in conjunction with Dreyfus. The frameworks are under development and Liberty is developing how the data and analytics will be used to inform decisions.</p> <p>ii. Liberty's staff are directly involved in decision making, collection and review of data inputs/outputs, and the development of the overall risk framework.</p> <p>b. Besides Technosys, Liberty plans to continue to work with Reax and Dreyfus on its wildfire risk modeling. Liberty subject matter experts ("SME") will be involved in the on-going operation of Liberty's wildfire risk modeling, including SMEs from data analytics, operations, regulatory, planning and engineering.</p>	Nathan Poon	6/18/2023	6/21/2023	6/21/2023	<p>Data Request OEIS-P-WMP_2023-LU-002_Liberty_Response_07/21/2023.pdf@bertvutilities.com</p>	6 Risk Methodology and Assessment (6.1)	6.1.1
OEIS		2	OEIS-P-WMP_2023-LU-002			<p>a. Does Liberty plan on replacing installed, non-exempt lightning/surge arrestors with CALFIRE exempt lightning/surge arrestors? If so, provide a timeline for the project and yearly replacement targets.</p>	<p>a. Liberty has initiated its evaluation of exempt lightning/surge arrestors. Liberty recently received sample materials and Liberty's Standards Committee plans to evaluate and recommend construction standards for install prior to piloting the technology. There are currently no timelines or yearly replacement targets set.</p>	Nathan Poon	7/27/2023	8/1/2023	8/1/2023	<p>Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08/01/2023.pdf@bertvutilities.com</p>		
OEIS		3	OEIS-P-WMP_2023-LU-003		1	<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>	<p>i. Liberty expects to complete the wildfire risk assessment using the 85th percentile consequence calculation prior to the 2024 WMP Update.</p>	Nathan Poon	7/27/2023	8/1/2023	8/1/2023	<p>Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08/01/2023.pdf@bertvutilities.com</p>		
OEIS		3	OEIS-P-WMP_2023-LU-003		2	<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 724.1 circuit miles in the HFTD and 35.6 circuit miles with a Total of 759.7 circuit miles.</p> <p>i. Provide Liberty's total circuit miles of Overhead Transmission Lines in the HFTD and Non-HFTD and Liberty's total circuit miles of Overhead Distribution Lines in the HFTD and Non-HFTD.</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 HFTD and 36.77 circuit miles in the Non-HFTD, with a total of 710.01 circuit miles. Please refer to the table below. (See response for table)</p>	Nathan Poon	7/27/2023	8/1/2023	8/1/2023	<p>Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08/01/2023.pdf@bertvutilities.com</p>	6 Risk Methodology and Assessment	
OEIS		3	OEIS-P-WMP_2023-LU-003		3	<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 HFTD, 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 HFTD, if not, explain why.</p> <p>ii. Are approximately 10% of the transmission poles inspected each year, or are the entirety of the transmission system poles inspected in one year, then again ten 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 HFTD, 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 HFTD zones. Liberty stays compliant with the G0365 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>iii. 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 HFTD zones. Liberty stays compliant with the G0365 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 HFTD zones. Liberty stays compliant with the G0365 timelines for overhead inspections.</p> <p>ii. Yes, same checklists.</p>	Nathan Poon	7/27/2023	8/1/2023	8/1/2023	<p>Data Request OEIS-P-WMP_2023-LU-003_Liberty_Response_08/23/2023.pdf@bertvutilities.com</p>	5 Electrical Infrastructure (5.2)	5.2
OEIS		4	OEIS-P-WMP_2023-LU-004		1	<p>OEIS-4-1</p>		Nathan Poon	8/18/2023	8/23/2023	8/23/2023	<p>Data Request OEIS-P-WMP_2023-LU-004_Liberty_Response_08/23/2023.pdf@bertvutilities.com</p>	8 Grid Design, operations, and maintenance (8.1)	8.1.3