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Last Updated: 7/25/2024					Liberty 2025 WMP Update Discovery Log							
Count Party Name	DR Set # Data Request	Question No.	Question ID	Q01. Regarding Liberty's Substation Defensible Space Target (WMP-VM-VFM-03): In Table 3-2 of its 2025 WMP Update, Liberty provided a "2025 Update Target" of 12 substations for Substation Defensible Space (WMP-VM-VFM-03).1 In its 2025 Update under Section 3.2.15 "WMP-VM-VFM-03: Substation Defensible Space," Liberty stated that "[t]he 2025 target for substation defensible space did not change. Liberty does not establish targets for its VM substation defensible space WMP initiative." 2 Liberty's revised 2023-2025	c. Liberty performs the same maintenance described in its WMP during both site visits. d. The first treatment is planned to occur between June 1st and September 30th and the second treatment is planned to occur between October 1 and December 31st.	Requestor Sara S. Moore	7/22/2024	Final Date Due 7/25/2024	T/24/2024 Links https://california.libertyutilities.com/uploads/Data% 20Request%200EIS-P-WMP_2024-LU- 001_LibertyResponse_07242024.pdf	Number of Attachements Attachment Links	NDA Required? WMP Section	Category Subcategory
OEIS	1 OEIS-P-WMP_2024-LU-001	1 C	OEIS-01-1.1	site visits" annually per facility. a. What is Liberty's 2025 target for substation defensible space? Provide both the number and the unit. b. If the target for 2025 is 12 substations is Liberty planning to notife meritarial substation truing a year amounting to 24 site visits nor year. Liberty states on p. 140 of its 2023-2025 Redline Redacted WMP, "Using the outputs from CloudFire, Liberty has identified circuits ordered by the most	effectively during Spring, Summer and Fall months. If vegetation re-growth or debris accumulation occurs inside substation footprints or perimeters between planned						3.2.15	N/A
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01	1 C	CalAdv-01-1.1	risk and targeted the circuits with the high risk." For the circuits that have been identified by Liberty's CloudFire application, please provide an Excel document that lists the top 20 circuits ordered by risk. The spreadsheet should include the following information in separate columns, at a minimum: a) Risk ranking of the circuit segmen b) Circuit ID number c) Name of circuit, if applicable d) Number of customers served by the circuit e) Measure taken, or planned to be taken, to reduce the wildfire risk of the circuit	risk circuits. Since Liberty is beginning to use the Direxyon Risk Assessment Tool ("DRAT") to identify risk, the requested information has been provided in relationship to the Preliminary t Risk Score outputs from DRAT described in Section 6.4 of Liberty's Updated 2023-2025 WMP. a) Refer to Section 6 of Liberty's Updated 2023-2025 WMP. b) Refer to Section 6 of Liberty's Updated 2023-2025 WMP. c) Refer to Section 6 of Liberty's Updated 2023-2025 WMP. d) Refer to supporting materials: DR01-Question 1	Aaron Louie	7/19/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf	1		
				Liberty states on p. 24 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-02: PSPS and Wildfire Risk Tradeoff Transparency, "Liberty does not currently calculate trade-offs between wildfire risk and PSPS risk. Liberty prioritizes mitigation initiatives based on wildfire risk and asset failure risk." a) What variables, if any does Liberty utilize to calculate PSPS risk? b) Please provide a brief description of Liberty's process and calculations used in calculating PSPS risk. c) What variables, if any does Liberty utilize to calculate wildfire risk? d) Please provide a brief description of Liberty's process and calculations used in calculating wildfire risk. e) Does Liberty view prioritizing mitigation initiatives (based on wildfire risk and asset failure risk) as a substitute for calculating tradeoffs between PSPS and Wildfire Risk? Please explain why or why not. f) According to Liberty, what are the disadvantages of calculating PSPS and Wildfire Risk tradeoffs?	a) Liberty PSPS Risk Model is currently in development. b) Liberty PSPS Risk Model is currently in development. c) Refer to Section 6.2 of Liberty's Updated 2023-2025 WMP d) Refer to Section 6.2 of Liberty's Updated 2023-2025 WMP e) Liberty does not view prioritizing mitigation initiatives as a substitute for calculating tradeoffs between PSPS and Wildfire Risk. Liberty's PSPS Risk Model is currently in development, so there is not a tradeoff between PSPS Risk and Wildfire Risk to evaluate. f) Liberty has not identified disadvantages of calculating PSPS and Wildfire Risk tradeoffs. g) Liberty is evaluating its ability to calculate PSPS Risk following the implementation of its	Aaron Louie	7/19/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01_Liberty%20Response_07242024.pdf			
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01	2 C	CalAdv-01-1.2	g)Does Liberty intend to be able to calculate PSPS and Wildfire Risk Tradeoffs in the future? If yes, when? Liberty states on p. 28 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-06: Effectiveness of Sensitive Relay Profile (SRP) and Traditional Hardening: SRP has not been implemented on the system or included in the risk model to allow for calculations on its effectiveness. In selecting SRP for its ignition reduction effectiveness, Liberty relied on data from other utilities that have been using it as a mitigation strategy. a) Please describe or provide a timeline of when Liberty will have the necessary data to show the effectiveness of SRP implementation as a mitigation strategy. b) Please describe or provide a timeline of when Liberty will incorporate SRP into the Direxyon Risk Assessment Tool (DRAT).	asset types with SRP being in the initial list of enhancements. Liberty expects to be completed with the additional enhancements by the end of Quarter 3 2025.		7/19/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01_Liberty%20Response_07242024.pdf			
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01	3 0	CalAdv-01-1.3	On p. 32-33 of its 2025 WMP Update, Liberty provides its response to Area of Continued Improvement LU-23-09: Covered Conductor Inspections and	Liberty does not have a previous version.	Agran Lavia	7/10/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%			
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01	4 C	CalAdv-01-1.4	Please provide the previous version of the Spacer Cable Inspection Checklist found in Appendix A of the WMP Update, prior to the recent updates. Liberty forecasts significantly increased 2025 updated expenditures for: •Undergrounding of electric lines and/or equipment (WMP-GDOM-GH-02) •Tree-attachment removal (WMP-GDOM-GH-12a) •Detailed inspections of distribution electric lines and equipment (WMP-GDOM-AI-01) •Patrol inspections of distribution electric lines and equipment (WMP-GDOM-AI-03) •Substation inspections (WMP-GDOM-AI-06) •Grid monitoring systems (WMP-SA-02)	a) Refer to supporting materials: DR01 – Question 5 b) Refer to supporting materials: DR01 – Question 5 c) Liberty rescoped the Rule 20 Tahoe Vista project in 2023. Based on RFPs conducted in 2023, civil contractor costs increased significantly. The original scope also included directional boring, which resulted in higher than expected costs and subsequently was removed from the project scope, resulting in decreased mileage. d) WMP-GDOM-GH-12a actual spend (\$ thousands):	Aaron Louie Aaron Louie	7/19/2024	7/24/2024 7/24/2024	7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf	1		
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01 1 CalAdvocates-Liberty-2025WMP-01		CalAdv-01-1.5	each of the initiatives listed above, please explain the reasoning behind the 2025 updated expenditure forecast. Liberty states on p. 35 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-11: Quality Assurance/Quality Conrtol (QA/QC) sample size and pass rates: "Liberty has established an asset inspection QA/QC target of 90% for 2024 and 2025." a) Please describe the QA/QC audit process for asset inspections. b) Please provide Liberty's internal protocols, procedures, or checklists regarding the QA/QC audit process for asset inspections. c) Will Liberty conduct field audits of each inspector's work to validate the results of an asset inspection?	2020 - \$1,358	Aaron Louie	7/19/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf	1		
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01	7	CalAdv-01-1.7	Liberty states on p. 35 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-13: Lightning arrestor replacement: Regarding the currently installed non-exempt arresters, Liberty's asset tracking application will be utilized to identify and track arresters in the field. When an exempt arrester is selected, Liberty will use the asset tracking application for project tracking. a) Has Liberty completed the development of the "asset tracking application"? b) If the answer to part (a) above is no, when will Liberty complete the development of the "asset tracking application"? c) How many non-exempt arresters are currently in place across Liberty's service territory? d) Does Liberty have plans to replace all non-exempt arresters currently in place across Liberty's service territory?	a) No. b) The timeline for finalizing the development of arrestors in Liberty's asset tracking application is not determined at this time. c) Liberty does not have this information at this time. d) No. e) Not determined. f) Not determined.	Aaron Louie	7/19/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf			
				Liberty states on p. 36-37 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-15: Reliability impacts of SRP: Liberty plans to implement its SRP program on 15 circuits in 2024 and seven circuits in 2025, which will result in 67.45% of Liberty's primary distribution conductor being covered by SRP by the end of 2025 Based on an analysis of historical weather data for the system, Liberty estimates approximately 10-12 days per year when SRP will be enabled. a) How did Liberty determine that the 22 circuits that will have SRP implemented (15 in 2024 and seven in 2025) would result in a 67.45% coverage of Liberty's primary distribution conductors? Please show your calculations or provide workpapers. b) When Liberty implements SRP on the 15 circuits in 2024, what is the total percentage of coverage that Liberty will achieve on the primary distribution conductors?	 c) Refer to supporting materials: DR01 – Question 8 and 9 d) Yes. e) N/A f) Liberty plans to implement SRP across all of Liberty's primary distribution conductors during 	g Aaron Louie	7/19/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP-	1		
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01	8 0	CalAdv-01-1.8	c) When Liberty implements SRP on the seven circuits in 2025, what is the total percentage of coverage that Liberty will achieve on the primary distribution conductors? d) Does Liberty plan on implementing SRP across all of Liberty's primary distribution conductors? e) If the answer to part (d) above is no, what is the estimated percentage of coverage that Liberty will achieve? f) If the answer to part (d) above is yes, when will Liberty achieve its goal of full coverage across all of Liberty's primary distribution conductors? g) Please provide the historical weather data used by Liberty to estimate that SRP will be enabled approximately 10-12 days per year. Liberty states on p. 36-37 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-15: Reliability impacts of SRP: Liberty plans to implement its SRP program on 15 circuits in 2024 and seven circuits in 2025, which will result in 67.45% of Liberty's primary distribution conductor being covered by SRP by the end of 2025 Based on an analysis of historical weather data for the system, Liberty estimates approximately	at 97th percentile or above, i.e. 3% of days of the year. 365 days * 3% = 11 days, which was broadened to 10-12 days. a) Refer to supporting materials: DR01 – Question 8 and 9 b) N/A				01_Liberty%20Response_07242024.pdf			
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01		CalAdv-01-1.9	10-12 days per year when SRP will be enabled. Please provide a list of the 22 circuits that have been identified for SRP implementation, with the following information about each circuit: a) Circuit ID number b) Circuit-segment name or ID number (if the projected SRP switch affects more than one-circuit segment, please identify each one) c) Year of planned implementation (2024 or 2025) d) How many SRP switches will be implemented across the circuit e) The expected or actual start date of the project f) The expected completion date of the project g) Length (in circuit miles) of each project	d) Refer to supporting materials: DR01 – Question 8 and 9 e) Refer to supporting materials: DR01 – Question 8 and 9 f) Refer to supporting materials: DR01 – Question 8 and 9 g) Refer to supporting materials: DR01 – Question 8 and 9	Aaron Louie	7/19/2024	7/24/2024	7/24/2024 https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP-01 Liberty%20Response 07242024.pdf	1		
CalAdvocates	1 CalAdvocates-Liberty-2025WMP-01	10	CalAdv-01-1.10	Liberty states on pp. 40-41 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-20: Early detection of Ignitions with HD Cameras, that "University of Nevada Reno (UNR) is performing a view shed analysis to propose locations of existing cameras for Liberty to adopt or potentially install new cameras where current coverage is lacking for the service territory." a) When does Liberty expect that UNR will complete the view shed analysis? b) Has Liberty developed any policy or procedures related to the implementation and maintenance of the HD wildfire cameras? c) If the answer to part (b) above is yes, please provide Liberty's policy and procedures for the implementation and maintenance of the HD wildfire cameras. d) Does Liberty know of any HD cameras (or cameras of similar function) within its service territory that it does not own? e) Does Liberty have access to any HD cameras (or cameras of similar function) within its service territory that it does not own? f) If the answer to part (e) above is yes, please list the HD cameras or cameras of similar function that are within Liberty's service territory including: i. Whom the cameras belong to ii. The camera's or cameras' location iii. How Liberty has gained access to footage from the cameras	a) UNR has completed the viewshed analysis and shared relevant results with Liberty on July 15, 2024. b) Liberty is currently reviewing the proposal and budget from UNR for set-up of new cameras within the service territory and maintenance of existing cameras that lack sustainable funding. New cameras are being proposed in areas that were missing coverage in the viewshed analysis done by UNR. Liberty has not yet entered into a contract with UNR for these cameras and does not have any existing policy or procedures related to the implementation and maintenance of the HD wildfire cameras. c) N/A d) Yes. There are currently 22 fire detection cameras that cover areas within Liberty's service territory. These cameras are available through the ALERTWildfire Program that is a consortium between UNR and University of Oregon. e) Yes, similar to the previous answer, these cameras are publicly viewable through alertwildfire.org. f) Fire Cameras that cover Liberty's Service Territory: (See response link for table)	Aaron Louie	7/19/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf			