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Last Hadeback 9/44/2024		Liberty 2025 WMP Update Discovery Log		
Last Updated: 8/14/2024  Count Party Name DR Set # Data Request	Question No.     Question ID     Question       Q01. Regarding Liberty's Substation Defensible Space Target (WMP-VM-VFM-03):	Responses Requestor a. 12 substations.	Date Received Final Date Due Date Sent Links	Number of Attachements Attachment Links NDA Required? WMP Section Category Subcategory
OEIS 1 OEIS-P-WMP_2024-LU-001	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). 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 2023-20 WMP, submitted with the 2025 WMP Update, does not provide a target for this initiative in Table 8-17 "Liberty Vegetation Management Initiative Targets by Year" or in its narrative description of the Substation Defensible Space initiative beyond the statement that there will be a "minimum of two site visits" annually per facility.  a. What is Liberty's 2025 target for substation defensible space? Provide both the number and the unit.	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.  Sara S. Moore effectively during Spring, Summer and Fall months. If vegetation re-growth or debris accumulation occurs inside substation footprints or perimeters between planned	re 7/22/2024 7/25/2024 7/24/2024 https://california.libertyutilities.com/uploads/Data% 20Request%200EIS-P-WMP_2024-LU-001_LibertyResponse_07242024.pdf	3 3.2.15 N/A
	Regarding Liberty's new QA assessment component of Liberty's Vegetation Management QA/QC program:  a. Provide Liberty's definition of quality assurance (QA) and how it differs from quality control (QC).  b. Provide the current version of Liberty's Post Work Verification Procedure (VM-04) including any updates related to the introduction of the new quality assurance (QA) assessment component of its Vegetation Management QA/QC program.  c. Describe Liberty's new QA assessment sampling plan and provide any associated standard operating procedures.  d. Provide a summary of the findings from the new QA assessment to date.	a. Liberty's Post Work Verification Procedure (VM-04) defines QA and QC in the definitions section on page 1 and 2. Refer to supporting materials: DR002 – Question 1a and 1b.  b. Refer to supporting materials: DR002 – Question 1a and 1b.  c. Refer to supporting materials: DR002 – Question 1c_1, DR002 - Question 1c_2, and DR002 - Question 1c_3.  d. Refer to supporting materials: DR002 – Question 1d.	re 7/26/2024 7/31/2024 7/30/2024 7/30/2024 https://california.libertyutilities.com/uploads/Data% 20Request%200EIS-P-WMP 2024-LU-002 Liberty%20Response 07302024.pdf	5
OEIS 2 OEIS-P-WMP_2024-LU-002  CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01	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 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	https://california.libertyutilities.com/uploads/Data% 7/19/2024 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 PSP 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 Asset and Fire Risk tool. Following the integration of Liberty's PSPS Risk with its Asset and Fire	https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01_Liberty%20Response_07242024.pdf	
CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01	CalAdv-01-1.2    Specific products to be able to calculate tradeoffs between wildfire sick and DERC sick?	RP) a) Liberty plans to enhance the Direxyon Risk Assessment Tool to quantify risk of additional 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.	https://california.libertyutilities.com/uploads/Data% 7/19/2024 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf	
CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01	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 Maintenance.	d Liberty does not have a previous version.  Aaron Louie	https://california.libertyutilities.com/uploads/Data% 7/19/2024 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP-	
CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01		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. r d) WMP-GDOM-GH-12a actual spend (\$ thousands):	https://california.libertyutilities.com/uploads/Data% 7/19/2024 7/24/2024	1
CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01  CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01	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?  d) If the answer to part (c) above is yes, who will conduct the field audits (e.g., a supervisor, a peer inspector, or a contractor) and when will the field	Updated 2023-2025 WMP. b) Refer to supporting materials: DR01 – Question 6b c) Liberty's QA/QC of detailed inspections is a random sample, so it is not specific to inspectors.  Aaron Louie	https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf	1
	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.	https://california.libertyutilities.com/uploads/Data% 7/19/2024 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01_Liberty%20Response_07242024.pdf	
CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01	7 CalAdv-01-1.7  e) How many non-exempt arresters will be replaced in 2024? 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	a) Refer to supporting materials: DR01 – Question 8 and 9 b) Refer to supporting materials: DR01 – Question 8 and 9		
	conductor being covered by SRP by the end of 2025 Based on an analysis of historical weather data for the system, Liberty estimates approximate 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) 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?	d) Yes.  w e) N/A  f) Liberty plans to implement SRP across all of Liberty's primary distribution conductors during the 2026-2028 WMP cycle.  g) The origin of the 10-12 days estimate comes from SFDI rating definition, which is "severe" 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.	https://california.libertyutilities.com/uploads/Data% 7/24/2024 7/24/2024 20Request%20CalAdvocates-Liberty-2025WMP- 01_Liberty%20Response_07242024.pdf	
CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01	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 distributio conductor being covered by SRP by the end of 2025 Based on an analysis of historical weather data for the system, Liberty estimates approximate 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		https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf	
CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01	f) The expected completion date of the project g) Length (in circuit miles) of each project 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 doe 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.  Aaron Louie 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.	https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf	
CalAdvocates 1 CalAdvocates-Liberty-2025WMP-01	1. Provide a list of balancing and memorandum accounts where the costs of wildfire mitigations are currently being recorded as of August 1, 2024. This should include accounts that were established before the current GRC time period where the costs of wildfire mitigations are still being recorded as of August 1, 2024. Additionally, this list should include what are considered both "cost" and "revenue" accounts, even if "revenue" accounts do not technically include "recorded" costs.  a. In this context, wildfire mitigations include any investments in assets, services or O&M that are used to reduce wildfire risk.  b. For each balancing and/or memorandum account listed, include which mitigation type from the WMP QDR Table 11 for which the account is used to record the costs:  l. Bindergrounding (UG)  ii. Evoered conductor (CC)  iii. Regetation management (VM)  iv. Bitter (describe)  c. Please provide the current dollar value of wildfire mitigations costs recorded to each listed account, including both "cost" and "revenue" accounts.  This should include costs booked to these accounts within the current GRC time period (Jan. 2023-Present) and any costs recorded before Jan. 2023 in an active balancing and/or memorandum account.  i. Elease provide an arrative explanation for how the current dollar value of wildfire mitigation costs is calculated for each account. This should include a breakdown of the kinds of costs that are included in the calculation.  d. Were any of the listed memorandum account and its associated balancing account, including both "cost" and "revenue" accounts.  i. Are there any circumstances where a memorandum account an map to more than one balancing account, or to another memorandum account?  ii. Are there any circumstances where a balancing account an map to more than one memorandum account, or to another memorandum account?  ii. Bre there any circumstances where a balancing account and more than one memorandum account, or to another memorandum account?  ii. Bre there any circumstances where a b	f) Fire Cameras that cover Liberty's Service Territory: (See response link for table)  is of line line line line line line line line		
CPUC SPD 1 SPD_WSPS_Liberty_2024_001	h. Elease provide all tabular data in pdf and excel spreadsheet format.  SPD-01-1.1  2. As of August 1, 2024, does Liberty have any pending Applications for balancing and/or memorandum accounts where it intends to record the costs of the c	Kevin Miller	8/9/2024 8/16/2024	
CPUC SPD 1 SPD_WSPS_Liberty_2024_001	wildfire mitigations?  a. This response should include both "cost" and "revenue" accounts.  b. Ef so, provide a list of those Application and Decision numbers and the type of mitigation Liberty intends to associate with these pending balancing and/or memorandum accounts.		8/9/2024 8/16/2024	

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