				LOG BEGINS J	ULY 8th, 2024.			LOG BEGINS JUL	Y 8th, 2024.						
Last Updated:	8/29/2024					Liberty 2025 WMP Update Discovery Log									
Count	Party Name DR Set #	Data Request OEIS-P-WMP_2024-LU-001	Question No.	Question ID OEIS-01-1.1	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	Responses a. 12 substations. b. Liberty intends to perform two site visits per substation to perform vegetation treatments. 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. e. Two treatments are intended to manage vegetation regrowth and debris accumulation effectively during Spring, Summer and Fall months. If vegetation re-growth or debris accumulation occurs inside substation footprints or perimeters between planned	Requestor Sara S. Moore	7/22/2024	7/25/2024		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
		OLIST WWIII _2024 LO 001	<u>.</u>		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.	- Sara S. Moore	7/26/2024	7/31/2024	7/30/2024	https://california.libertyutilities.com/uploads/Data% 20Request%200EIS-P-WMP 2024-LU- 002 Liberty%20Response 07302024.pdf	5		5.2.15	
	OEIS 2	OEIS-P-WMP_2024-LU-002	1	OEIS-02-2.1	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	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.	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			
CalA	dvocates 1	CalAdvocates-Liberty-2025WMP-01	1	CalAdv-01-1.1	e) Measure taken, or planned to be taken, to reduce the wildfire risk of the circuit Diberty 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?	d) Refer to supporting materials: DR01-Question 1 a) Defeate supporting materials: DR01 Question 1 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	7/24/2024	https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf				
CalA	dvocates 1	CalAdvocates-Liberty-2025WMP-01	2	CalAdv-01-1.2	g)Does Liberty intend to be able to calculate PSPS and Wildfire Risk Tradeoffs in the future? If yes, when? NWhat does Liberty pand in order to be able to calculate tradeoffs between wildfire risk and DSDS risk? 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	Asset and Fire Risk tool. Following the integration of Liberty's PSPS Risk with its Asset and Fire Risk Liberty will be able to evaluate its intention to calculate a tradeoff between RSPS and 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.		7/19/2024	7/24/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf				
CalA	dvocates 1	CalAdvocates-Liberty-2025WMP-01	3	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.	Liberty does not have a previous version.	Aaron Louie	7/19/2024	7/24/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP-				
CalA	dvocates 1	CalAdvocates-Liberty-2025WMP-01	4	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)	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.	Aaron Louie	7/19/2024	7/24/2024	7/24/2024	01 Liberty%20Response 07242024.pdf https://california.libertyutilities.com/uploads/Data% 20Request%20CalAdvocates-Liberty-2025WMP- 01 Liberty%20Response 07242024.pdf	1			
		CalAdvocates-Liberty-2025WMP-01	5	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?		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-Liberty-2025WMP-01 CalAdvocates-Liberty-2025WMP-01	<u>6</u> 7	CalAdv-01-1.6	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.	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	7/24/2024	https://california.libertyutilities.com/uploads/Data% 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) 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?	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	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			
Call	dvocates 1	CalAdvocates-Liberty-2025WMP-01	8	CalAdv-01-1.8	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 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	a) Refer to supporting materials: DR01 – Question 8 and 9 b) N/A c) Refer to supporting materials: DR01 – Question 8 and 9 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			
Cal	dvocates 1	CalAdvocates-Liberty-2025WMP-01	9	CalAdv-01-1.9	Cameras, that "University of Nevada Reno (UNR) is performing a view shed analysis to propose locations of existing cameras for Liberty to adopt or	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.	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				
Cal <i>l</i>	dvocates 1	CalAdvocates-Liberty-2025WMP-01	10	CalAdv-01-1.10	iii. How Liberty has gained access to footage from the cameras Liberty's response to question 4 of data request CalAdvocates-Liberty-2025WMP-01 states: "Liberty does not have a previous version [of its Spacer Cable Inspection Checklist]." Please explain which portions of the Spacer Cable Inspection Checklist, found in Appendix A of Liberty's 2025 WMP Update, correspond with the each of the identified failures specific to covered conductor listed below: • Water intrusion; Splice covers; Surface damage/bulging; Bracket placement	 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) • Water intrusion: Safety Standards – Meets construction standards; Taps and Splices – Splices covered with Hendrix KM splice or equivalent; Hardware/Messenger – Adequate slack between phase conductors. • Splice covers: Safety Standards – Meets construction standards; Taps and Splices – Bushing covers used on transformers. • Surface damage/bulging: Meets construction standards; Material – Used all Hendrix 		8/23/2024	8/28/2024	8/28/2024					
CalA	dvocates 2	CalAdvocates-Liberty-2025WMP-02	1	CalAdv-02-2.1		approved components; Material – Only covered Tie Wires used; Taps and Splices – Rubber covered transformer tap wire used. • Bracket placement: Safety Standards – Meets construction standards; Taps and Splices – Anti Sway brackets (BAS-14/24) used at poles with taps. a) The asset tracking application is already developed and in production use. Liberty will enhance the application over the 2026-2028 WMP cycle to add tracking for lightning arrestors. b) Liberty developed the application internally using the third party application Fulcrum and plans to develop future enhancements internally. c) N/A d) No; Liberty has not replaced non-exempt lightning arrestors across its service territory.	Aaron Louie	8/23/2024	8/28/2024	8/28/2024	Data Request CalAdvocates-Liberty-2025WMP- 02 Liberty Response 08282024.pdf (libertyutilities.com)				
Call	durantes 2	Collador cotos Liberto 2025MAD 02	2	CalAdv-02-2.2	territory? e) If the answer to part (d) above is yes, provide a copy or description of Liberty's processes regarding replacement of non-exempt lightning arrestors.	e) N/A					Data Request CalAdvocates-Liberty-2025WMP- 02 Liberty Response 08282024.pdf				
Cali	dvocates 2	CalAdvocates-Liberty-2025WMP-02	2	CalAdv-U2-2.2	quarter 2024 Quarterly Data Report filing. a) Please explain why Liberty has not completed any circuit miles of covered conductor installation in 2024. b) Please provide a list of all covered conductor projects that were planned for 2024-2025 and that have been delayed due to permitting issues. c) Please provide an Excel document that lists each covered conductor project identified in your response to part (b), which should include the following information in separate columns, at a minimum: a. Circuit ID number b. Name of circuit, if applicable c. Designation of HFTD area d. The expected or actual start date of the covered conductor project	a) Liberty has experienced permitting delays and construction delays with its planned projects due to limited operating periods imposed by the US Forest Service. Liberty has also experienced material delays in 2024. b) Angora Ridge and Fallen Leaf C covered conductor projects. c) - See response for table.	Aaron Louie	8/23/2024	8/28/2024	8/28/2024	(libertyutilities.com)				
CalA	dvocates 2	CalAdvocates-Liberty-2025WMP-02	3	CalAdv-02-2.3	e. The expected completion date of the covered conductor project, when Liberty submitted its 2023-2025 WMP f. The expected completion date of the covered conductor project, as of now. Liberty has provided an update on initiative "WMP-GDOM-GH-02: Undergrounding of electric lines and/ or equipment," in Table 1 of the Excel file attachment titled "Liberty_2024_Q2_Tables115_R0.xlsx". Table 1 states Liberty has completed zero circuit miles of undergrounding of electric lines and/or equipment as of the second quarter 2024 Quarterly Data Report filing. Please explain why Liberty has not completed any circuit miles related to the undergrounding of electric lines and/or equipment in 2024.	As explained in Liberty's 2024 WMP Change Order Request, Liberty will not be completing its undergrounding target in 2024 due to project delays and permitting issues.	Aaron Louie	8/23/2024	8/28/2024	8/28/2024	Data Request CalAdvocates-Liberty-2025WMP- 02 Liberty Response 08282024.pdf (libertyutilities.com) Data Request CalAdvocates-Liberty-2025WMP-				
		CalAdvocates Liberty 2025WMP-02	<u>-</u>	CalAdv-02-2.4	Liberty has provided an update on initiative "WMP-GDOM-GH-12b: Expulsion fuse replacement," in Table 1 of the Excel file attachment titled "Liberty_2024_Q2_Tables115_R0.xlsx". Table 1 states Liberty has completed eight expulsion fuse replacements as of the second quarter 2024 Quarterly Data Report filing. a) Please provide a brief description of Liberty's plan to replace the remaining 492 expulsion fuses to achieve its targeted goal of 500 expulsion fuse replacements in 2024. b) Poes Liberty have an estimated number of expulsion fuses replacements that it will complete by the end of quarter 22.	 a) Liberty has replaced 184 expulsion fuses through July 2024. Liberty plans to meet its target of 500 expulsion fuse replacements in 2024. b) Liberty does not have an expulsion fuse replacement quarterly target for Quarter 3 of 2024. 	Aaron Louie	8/23/2024	8/28/2024	8/28/2024	O2 Liberty Response 08282024.pdf				
Cal	dvocates 2	CalAdvocates-Liberty-2025WMP-02	5	CalAdv-02-2.5	b) Does Liberty have an estimated number of expulsion fuses replacements that it will complete by the end of quarter 3? Regarding Liberty's initiative "WMP-GDOM-AI-05: Quality assurance/ quality control of inspection," as part of Liberty's presentation during the 2025 Wildfire Mitigation Plan Update Group 2 Workshop, Liberty stated that by the end of 2025 Liberty will achieve a target of 12% of detailed asset inspections, while achieving a 90% pass rate. a) Will Liberty conduct any QA/QC of detailed inspections during 2024? b) If the answer to part (a) above is yes, what percentage of detailed inspections will Liberty target? c) If the answer to part (a) above is yes, does Liberty have a target pass rate for 2024?	a) Yes. b) 12%. c) Yes. Refer to Section 6.11 of Liberty's 2025 WMP Update.	Aaron Louie	8/23/2024	8/28/2024	8/28/2024	(libertyutilities.com) Data Request CalAdvocates-Liberty-2025WMP-				
CalA	dvocates 2	CalAdvocates-Liberty-2025WMP-02	6	CalAdv-02-2.6							02 Liberty Response 08282024.pdf (libertyutilities.com)				

	Ţ				
	J				
	J				
			 		
 			 		
			 	 	
 	+	 	 	 	
 					
 			 		
	J				
					•
	ļ ,				