LOG BEGINS JULY 8th, 2024.

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Liberty 2025 WMP Update Discovery Log

Last Updated: 3/20/2025

Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question	Responses	Requestor	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	1	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 defensible space did not change. Liberty does not establish targets for its VM substation defensible space WMP initiative."2 Liberty's revised 2023-2025 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.	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	Sara S. Moore	7/22/2024	7/25/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Request%20OEIS-P-WMP_2024-LU-001_LibertyResponse_07242024.pdf				3	3.2.15	N/A
	OEIS	2	OEIS-P-WMP_2024-LU-002	1	OEIS-02-2.1	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%20OEIS-P-WMP_2024-LU-002_Liberty%20Response_07302024.pdf	5					
	OEIS	3	OEIS-P-WMP_2024-LU-003	1	OEIS-03-3.1	In Liberty's response to area for continued improvement LU-23-18 "Weather Station Optimization" Liberty indicated it has "engaged Eagle Rock Analytics to perform a weather station optimization analysis for its system to evaluate how well the network captures the diversity of climate conditions within Liberty's territory."1 a. When does Liberty expect to receive the final analysis from Eagle Rock Analytics? b. Will Liberty make this final analysis available to the public?	a. Liberty expects to receive the final analysis from Eagle Rock Analytics by the end of 2024. b. Yes, Liberty will provide the final analysis in its next WMP submission or in response to stakeholder request.	Sara S. Moore	9/6/2024	9/11/2024	9/11/2024	https://california.libertyutilities.com/uploads/Data%20Request%20OEIS-P-WMP_2024-LU-003_Liberty%20Response_09112024.pdf						
	OEIS	3	OEIS-P-WMP_2024-LU-003	2	OEIS-03-3.2	Were the cost categories listed in Liberty's 2025 WMP Update (i.e., project permitting, community outreach, communications, and various vegetation management program development activities, as listed in Section 2.2.19.3) included in the projected expenditures in its 2023-2025 Base WMP?2 a. If they were not included, please describe how and why cost assumptions and expenditure categories (as listed in Section 2.2.19.3) have changed between its 2023-2025 Base WMP and its 2025 WMP Update. b. If they were included, please describe how cost assumptions for the categories listed in Section 2.2.19.3 have changed since the approval of Liberty's 2023-2025 Base WMP on February 5, 2024.	2. Yes, the cost categories associated with WMP-VM-ESG-01 were included in the projected expenditures in Liberty's 2023-2025 Base WMP. a. N/A. b. The cost assumptions regarding tracking and recording these categories have changed to capture all of the costs of project permitting within a single initiative. Previously some of the cost categories, mostly project permitting, were recorded as part of the costs of associated initiatives. For example, project permitting costs associated with fall-in mitigation work were projected and recorded within Liberty's fall-in mitigation WMP initiative. As of the 2025 WMP Update, Liberty will project and track all of the cost categories listed in WMP-VM-ESG-01 within that initiative.	Sara S. Moore	9/6/2024	9/11/2024	9/11/2024	https://california.libertyutilities.com/uploads/Data%20Request%20OEIS-P-WMP_2024-LU-003_Liberty%20Response_09112024.pdf						
	OEIS	4	OEIS-P-WMP_2024-LU-004	1	OEIS-04-4.1	a. Please provide Liberty's current distribution detailed inspection checklist, referenced on page 42 of Liberty's 2025 WMP Update R1.	a. See below for Liberty's current distribution detailed inspection checklist: Condition codes for failed inspections: • Bare Equipment Jumpers • Clearance • Climbing Space • Crossarm Braces Falling Off • Crossarm Broken / Split / Loose • Crossarm Needs Replacing • Equipment Anchors • Foreign Objects on Poles	Jessica McHale	10/3/2024	10/8/2024	10/8/2024	Data Request OEIS-P-WMP_2024-LU-004_Liberty Response_10082024.pdf (libertyutilities.com)						
	OEIS	4	OEIS-P-WMP_2024-LU-004	2	OEIS-04-4.2	a. In its 2025 WMP Update R1, Liberty lists a target change for initiative "WMP-GDOM-AI-05: Quality assurance / quality control of inspections," increasing from a 2025 Original Target of 3 percent to a 2025 Updated Target of 12 percent. However, in both Liberty's approved 2023-2025 Base WMP and its revised 2023-2025 Base WMP R6, the "Target 2025 & Unit" is listed as 12 percent for this initiative. i. Please confirm whether Liberty incorrectly listed 3 percent (instead of 12 percent) as the "2025 Original Target" in its 2025 WMP Update. 1. If so, please confirm that there is there no 2025 target change associated with initiative "WMP-GDOM-AI-05: Quality assurance/quality control of inspections."	a. i. Liberty confirms that it incorrectly listed 3 percent (instead of 12 percent) as the "2025 Original Target" in its 2025 WMP Update. 1. Liberty confirms that there is no 2025 target change associated with initiative "WMP-GDOM-AI-05: Quality assurance/quality control of inspections."	Jessica McHale	10/3/2024	10/8/2024	10/8/2024	Data Request OEIS-P-WMP_2024-LU-004_Liberty Response_10082024.pdf (libertyutilities.com)						
	OEIS	5	OEIS-P-WMP_2024-LU-005	1	OEIS-05-5.1	a. Please provide the circuits or circuit segments planned to be undergrounded in 2025 as part of the Tahoe Vista project. i. Provide the percentage of the project circuit miles in the HFTD Tier 3. ii. Provide the percentage of the project circuit miles in the HFTD Tier 2. iii. Provide the fire risk scores, asset risk scores, and composite risk scores for each circuit or circuit segment. b. Please provide the circuits or circuit segments that are no longer planned to be undergrounded in 2025 as part of the Stateline Resiliency project. i. Provide the percentage of the project circuit miles in the HFTD Tier. ii. Provide the percentage of the project circuit miles in the HFTD Tier. iii. Provide the fire risk scores, asset risk scores, and composite risk scores for each circuit or circuit segment.	a. Circuit KBH5200 i. 0% ii. 100% iii. See response link for table. b. Circuits STL2200 and STL2300 i. 0% ii. 100% iii. See response link for table.	Jessica McHale	10/18/2024	10/23/2024	10/23/2024	Data Request OEIS-P-WMP_2024-LU-005_Liberty Response_10232024.pdf						
	OEIS	5	OEIS-P-WMP_2024-LU-005	2	OEIS-05-5.2	a. For each circuit listed in Table 1-1 of Liberty's 2025 WMP Update, list whether the circuit is in the HFTD Tier 3, Tier 2, or non-HFTD. If the circuit spans more than one tier, provide the number of circuit miles in each tier..	a. See response link for table.	Jessica McHale	10/18/2024	10/23/2024	10/23/2024	Data Request OEIS-P-WMP_2024-LU-005_Liberty Response_10232024.pdf						
	OEIS	6	OEIS-P-WMP_2024-LU-006	1	OEIS-06-6.1	a. What is Liberty's estimated completion date for the Stateline Resiliency Project?	a. The estimated completion date for the Stateline Resiliency Project is November 1, 2026.	Jessica McHale	10/25/2024	10/30/2024	10/30/2024	Data Request OEIS-P-WMP_2024-LU-006_Liberty Response_10302024.pdf						
	OEIS	6	OEIS-P-WMP_2024-LU-006	2	OEIS-06-6.2	a. Does Liberty plan to mitigate risk on circuits STL2200 and STL2300 in 2025 via interim mitigations such as SRP, additional asset or vegetation management inspections, or traditional hardening? i. If so, please provide details on interim mitigation plans for these circuits.	a. Yes. i. In 2025, Liberty will include both circuits STL2200 and STL2300 in its Vegetation Management Patrol Inspections (WMP-VM-INSP-02). Additionally, circuit STL2200 is included in Liberty's Detailed Asset Inspection (WMP-GDOM-AI-01) schedule for 2025 and circuit STL2300 will be included in Liberty's Patrol Asset Inspections (WMP-GDOM-AI-03) in 2025.	Jessica McHale	10/25/2024	10/30/2024	10/30/2024	Data Request OEIS-P-WMP_2024-LU-006_Liberty Response_10302024.pdf						
	OEIS	7	OEIS-P-WMP_2025-LU-007	1	OEIS-07-7.1	Energy Safety's Data Guidelines require electrical corporations to report the actual and projected costs of initiatives in Wildfire Mitigation Data Table 11.1 Liberty's 2024 Q4 Quarterly Data Report (QDR), submitted on February 3, 2025, did not include expenditure actuals for 2024.2 In response to Energy Safety's request, Liberty submitted a revised 2024 Q4 QDR on February 7, 2025, updating Table 11 (column AD) to provide Liberty's reason for the blank 2024 actuals fields, which stated "2024 actual costs are not available yet."3,4 Please provide when Liberty will submit a revised and complete 2024 Q4 QDR with 2024 actuals included.	Liberty will submit a revised 2024 Q4 QDR with its 2024 actual costs included by March 31, 2025.	Jessica McHale	3/5/2025	3/10/2025	3./7/2025	Liberty Response to DR No. OEIS-P-WMP-2025-LU-007.pdf						
	CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	1	CalAdv-01-1.1	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 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 segment 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	Liberty was previously utilizing the risk score outputs from Reax and Arup to quantify its 20 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	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	2	CalAdv-01-1.2	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? g)Does Liberty intend to be able to calculate PSPS and Wildfire Risk Tradeoffs in the future? If yes, when?	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	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						
	CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	3	CalAdv-01-1.3	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).	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. b) See Response 3a.	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						
	CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	4	CalAdv-01-1.4	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. 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 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-01_Liberty%20Response_07242024.pdf						
	CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	5	CalAdv-01-1.5	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) For each of the initiatives listed above, please explain the reasoning behind the 2025 updated expenditure forecast.	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): 2020 - $1,358	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	6	CalAdv-01-1.6	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	a) Liberty describes its WMP QA/QC process for asset inspections in Section 8.16 of its 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. d) N/A	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	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	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Request%20CalAdvocates-Liberty-2025WMP-01_Liberty%20Response_07242024.pdf						
	CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	8	CalAdv-01-1.8	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? 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.	a) Refer to supporting materials: DR01 – Question 8 and 9 b) Refer to supporting materials: DR01 – Question 8 and 9 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 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.	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	9	CalAdv-01-1.9	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 g) Length (in circuit miles) of each 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					
	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	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Request%20CalAdvocates-Liberty-2025WMP-01_Liberty%20Response_07242024.pdf						
	CalAdvocates	2	CalAdvocates-Liberty-2025WMP-02	1	CalAdv-02-2.1	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	• 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 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.	Aaron Louie	8/23/2024	8/28/2024	8/28/2024	Data Request CalAdvocates-Liberty-2025WMP-02_Liberty Response_08282024.pdf (libertyutilities.com)						
	CalAdvocates	2	CalAdvocates-Liberty-2025WMP-02	2	CalAdv-02-2.2	Liberty's response to question 7(b) of data request CalAdvocates-Liberty-2025WMP-01 states that "The timeline for finalizing the development of arrestors in Liberty's asset tracking application is not determined at this time." a) Will Liberty start the planning and development of the asset tracking application during the 2026-2028 WMP cycle? b) If the answer to part (a) above is yes, does Liberty plan to consult with a third-party vendor or to develop the asset tracking application internally? c) If Liberty plans to use a third-party vendor, please provide the name of the vendor and a description of the projected duties and responsibilities related to the development of the asset tracking application. d) Does Liberty currently have processes in place to track and record which non-exempt lightning arrestors have been replaced across its service 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.	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. e) N/A	Aaron Louie	8/23/2024	8/28/2024	8/28/2024	Data Request CalAdvocates-Liberty-2025WMP-02_Liberty Response_08282024.pdf (libertyutilities.com)						
	CalAdvocates	2	CalAdvocates-Liberty-2025WMP-02	3	CalAdv-02-2.3	Liberty has provided an update on initiative "WMP-GDOM-GH-01: Covered conductor installation," 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 covered conductor installation as of the second 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 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.	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	Data Request CalAdvocates-Liberty-2025WMP-02_Liberty Response_08282024.pdf (libertyutilities.com)						
	CalAdvocates	2	CalAdvocates-Liberty-2025WMP-02	4	CalAdv-02-2.4	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)						
	CalAdvocates	2	CalAdvocates-Liberty-2025WMP-02	5	CalAdv-02-2.5	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) Does Liberty have an estimated number of expulsion fuses replacements that it will complete by the end of quarter 3?	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	Data Request CalAdvocates-Liberty-2025WMP-02_Liberty Response_08282024.pdf (libertyutilities.com)						
	CalAdvocates	2	CalAdvocates-Liberty-2025WMP-02	6	CalAdv-02-2.6	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	Data Request CalAdvocates-Liberty-2025WMP-02_Liberty Response_08282024.pdf (libertyutilities.com)						