

BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY

OEIS Docket: 2024 Wildfire Mitigation Plan
Annual Report on Compliance

Docket #2024-EC_ARC

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC'S (U 933-E) 2024 WILDFIRE
MITIGATION PLAN ANNUAL REPORT ON COMPLIANCE**

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MITIGATION PLAN ANNUAL REPORT ON COMPLIANCE**

Pursuant to Cal. Pub. Util. Code § 8386 and the Office of Energy Infrastructure Safety (“OEIS”) Resolution M-4860, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby files this Annual Report on Compliance (“ARC”) regarding Liberty’s 2024 Wildfire Mitigation Plan (“2024 WMP”). This ARC follows the guidance in Section 6 of the Office of Energy Infrastructure Safety (“OEIS” or “Energy Safety”) Compliance Guidelines issued in September 2024.

I. LIBERTY’S ASSESSMENT OF PROGRESS TOWARD MEETING WMP OBJECTIVES AND TARGETS IN 2024

A. Liberty’s description of progress toward achieving the summarized objectives for the three- and 10-year WMP plan cycles, as identified in Section 4.2 of Liberty’s 2023-2025 WMP.

In accordance with Cal. Pub. Util. Code § 8386(a), Liberty constructs, maintains, and operates its electric system in a manner that minimizes the risk of catastrophic wildfire posed by its electric power lines and equipment. Liberty’s overarching WMP goal is to prevent and mitigate the risk of wildfires caused by utility equipment. In 2024, Liberty continued to identify ways to enhance its wildfire prevention and mitigation efforts. Liberty’s overall progress in 2024 implementing its WMP met the risk reduction intent of its 2024 WMP to reduce ignition probabilities and minimize the societal

consequences (with specific consideration to the impact on Access and Functional Needs (“AFN”) populations and marginalized communities) of both wildfires and the mitigations employed to reduce them, including Public Safety Power Shutoff (“PSPS”) events.

In 2024, Liberty made significant progress achieving its WMP objectives summarized in Section 4.2 of its 2024-2025 WMP. Refer to Table 1 below.

Table 1: Progress Toward Achieving 2023-2025 WMP Section 4.2 Summarized Objectives

| WMP Category | Summarized Objective in 2023-2025 WMP | Description of Liberty's Progress Toward Achieving Objective |
|---|--|---|
| Risk Analysis | Develop circuit segment wildfire and PSPS risk scores that factor in weighted asset risk of failure with vegetation contact risk to plan for effective mix of mitigations. | As of September 2024, Liberty has developed circuit-segment wildfire risk scores that factor in weighted asset risk of failure with vegetation contact risk. Liberty is currently developing the PSPS Risk component of its model, which is targeted for completion in April 2025. |
| | Develop baseline risk scores at the circuit level and at the overall system level. | As of September 2024, Liberty has developed baseline risk scores at the circuit level and at the overall system level. |
| | Improve risk-based decision-making framework using risk models and analyses (e.g., Technosylva Wildfire Risk Reduction Model (“WRRM”), pole risk and investment optimization models and process flow charts, wildfire and PSPS consequence models with social vulnerabilities factored, weather analytics for situational awareness and mitigation planning). | Liberty has made significant risk model updates to improve its risk-based decision making framework. Energy Safety's evaluation of these risk model updates finds Liberty's new risk models and decision-making framework will likely improve Liberty's understanding of risk across its system. |
| Grid Hardening | Continue compliance-based pole replacements and repairs and target new locations based on Technosylva’s WRRM analyses. | Liberty has continued compliance-based pole replacements and repairs on poles that have been identified in the field through its asset inspection process. Liberty did not target new locations based on Technosylva's WRRM analyses in 2024. |
| | Evaluate the appropriate mitigations for the highest wildfire risk areas in Liberty’s service territory. The evaluation process and risk assessment will consider: - The percentage of Liberty’s system that is newly rebuilt, including the number of poles and line miles replaced since 2019 (i.e., covered conductor projects, G.O. 165 survey repairs and replacements, fire-damage replacements, distribution line rebuilds). - The number of equipment repairs on overhead (“OH”) poles since 2019 (i.e., OH service failures, storms, G.O. 165 repairs). - Substation upgrades and rebuilds. Liberty has replaced oil-filled circuit breakers and wooden substructures and has improved its defensible vegetation clearance around substations. | Grid hardening initiatives have been incorporated into Liberty's risk model. Inputs to the model include vegetation management, pole replacements, fuse replacements, overhead conductors, outage data, work orders, and maintenance history. |
| Vegetation Management | Maintain current VM program. | Liberty maintained its planned vegetation management operations throughout 2024 including all planned inspection protocols, VM maintenance work, and program management approaches. |
| | Complete effectiveness of enhanced clearances study. | In 2024 Liberty performed an analysis of vegetation clearances to conductors derived from LiDAR inspections from 2021 through 2023. Liberty found that overall average distance to wires in vegetation management regions are increasing. Liberty also determined occurrences of vegetation distances to wire in each grow-in zone was reduced (grow-in zone 1 reduced by 43%, grow-in zone 2 reduced by 85%, grow-in zone 3 reduced by 66%) through change analysis of annual vegetation LiDAR data. |
| | Complete vegetation risk modeling. | Vegetation management has been incorporated into Liberty's risk model. The vegetation management inputs include historical tree inventories, LiDAR data, and maintenance history to identify risk reduction. |
| | Complete fall-in risk scoring model pilot. | Liberty conducted an analysis of a fall-in risk scoring model derived through LiDAR inspections in 2023 and concluded the assessment in December of 2023. |
| | Implement Integrated Vegetation Management (“IVM”) monitoring program. | Liberty has implemented its IVM monitoring program by establishing monitoring plots on sections of its distribution and transmission lines. |
| | Develop utility arborist training program for Liberty’s service area | Liberty developed a series of three online training modules for arborists in 2024. Work continued in 2024 on three additional online training modules that are planned to be released in 2025. |
| Situational Awareness | Determine weather station network capacity. | Liberty had analysis of its network completed in 2024 and provided that data to its weather station vendor for analysis and to determine the need for any additional weather stations. |
| | Implement maintenance program for weather stations. | Liberty implemented a maintenance program for weather stations in 2024. |
| | Research emerging technologies for future fault detection pilot programs. | The University of Nevada Reno (“UNR”) completed a Fire Mitigation Protection System Study for Liberty that looked at High Impedance Fault Detection (“HIFD”). The study recommended that Liberty should pursue a fast trip or SRP scheme to reduce fire risk. Liberty implemented its SRP Program in 2024. |
| | Work with AlertWildfire to own and operate cameras to track smoke and fires. | Liberty is working with University of Nevada at Reno (UNR) to execute an agreement for sponsoring cameras. In 2024, UNR completed view shed analysis to propose new camera locations for Liberty's territory. |
| | Implement new technologies if available (i.e., AI smoke detection) to identify ignitions more quickly. | Liberty has not identified new technologies to implement on its system and is continuing to work towards improving wildfire camera network for AI smoke detection through the AlertWest network. |
| | Improve weather forecasting capabilities as models improve or additional data becomes available. | Liberty has improved weather forecasting abilities by procuring Technosylva Wildfire Analyst tools. |
| Emergency Management and Stakeholder Collaboration | Update workforce training on incident Command System (“ICS”). | All Incident Management Team members have received training through Liberty Utilities Learning Management System (LMS). LMS module addresses Incident Command response and is based on the FEMA ICS 100 and ICS 200 courses. Training participation is assigned and tracked through the LMS system. |
| | Maintain Emergency Response Plans. | Emergency Management maintains an All Hazards Emergency Response Plan. The main plan details emergency response procedures and separate annexes or play books address, Wildfire, Winter Storms, and Public Safety Power Shutoffs. |

| WMP Category | Summarized Objective in 2023-2025 WMP | Description of Liberty's Progress Toward Achieving Objective |
|--------------|--|--|
| | Engage with local stakeholders to prepare for and respond to fire-related events. | Liberty engages with local stake holders to prepare for and respond to fire related events. This includes but is not limited to participation in local fire and safety fairs, and Fire Department community outreach meetings. In addition, Liberty conducts a Public Safety Workshop for all Public Safety Partners on an annual basis. |
| | Enhance documentation and use of lessons learned to update plans. | Individual Emergency Response Plan annexes are increased in granularity through Liberty's Lessons Learned Program. Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are subsequently updated to reflect lessons learned and increase granularity. |
| | Increase granularity and customization of response plans. | Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are subsequently updated to reflect lessons learned and increase granularity of the plans. |
| | Implement planned communication channels and technologies with customers, community, and stakeholders. | Planned communications channels and technologies have been implemented with customers, the community and stake holders. Liberty has a very detailed database of Public Safety Partners and Stakeholders that is updated on a continual basis. The database is part of Liberty's OnSolve communication system that can be employed to communicate with customers and Public Safety Partners. |
| | Collaborate with CBO networks to support, educate, notify, and prepare AFN communities. | In 2024 Liberty utilized its connections to local organizations by participating in community events and holding presentations in collaboration with CBOs. These events were valuable opportunities to educate and prepare AFN communities across Liberty's service territory regarding PSPS Preparedness, customer assistance programs, and AFN self-identification. |
| | Collaborate with public safety partners to support, educate, notify, and prepare AFN communities. | Liberty worked collaboratively in 2024 with Public Safety Partners across the service territory through inclusion in preparedness planning, presentations, community outreach, and direct communications. |
| | Support bilingual outreach through the utilization of bilingual outreach coordinator. | Liberty employs a Bilingual Outreach Coordinator as part of the Community Outreach Team. This position provides outreach to the Hispanic population in our service territory. The responsibilities of the position include assisting Spanish Speaking customers fill out applications for Liberty community assistance programs. |
| | Identify improvements to overall accessibility of information available to AFN customers. | In 2024 Liberty spread preparedness information via direct mailing to all identified AFN customers and provided preparedness information to vulnerable senior populations through a shelf-stable meal box effort. Collaborative outreach with CBOs allows Liberty to consider how to target AFN categories when providing this information. |
| | Encourage self-identification of AFN customers through targeted outreach and communications. | In 2024 Liberty advertised AFN self-ID forms through local organizations, outreach events, Community Resource centers, Liberty's website, the assistance program enrollment process, and ad campaigns. |
| | Hold regular PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy. | Liberty conducts regular PSPS meetings with Tahoe Donner PUD and NV Energy. Meetings are conducted every two weeks during Fire Season and every four weeks during the non-fire season. |
| | Communicate effectively with stakeholders through tailored approaches for outreach, engagement, and information exchange with customers, communities, and stakeholders based on various groups' unique needs. Identify emerging channels and technologies to better communicate with customers, community, and stakeholders. | Liberty provides tailored approaches for outreach, engagement and information exchange with customers, stakeholder based on various groups. Events include but are not limited to community Fire and safety fairs, presentations to Public Safety Partners, and community outreach events held throughout the Liberty Service Territory. |

B. Liberty’s description of progress toward achieving the three- and ten-year detailed objectives listed in the tables in Section 8 of Liberty’s 2023-2025 WMP.

Liberty made significant progress achieving its three- and 10-year objectives detailed in Section 8 of its 2023-2025 WMP. Refer to Table 2 below.

Table 2: Progress Toward Achieving 2023-2025 WMP Section 8 Detailed Objectives

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2024 |
|---|---|------------------------|---|------------------------------|--|---|
| Grid Design, Operations and Maintenance | Build out a Sensitive Relay Profile (“SRP”) program throughout Liberty’s system to reduce ignition risk. Install additional reclosers to help with sectionalization. Install additional fault indicators to help with reliability | 3 | WMP-GDOM-GO-01; WMP-GDOM-GH-08; WMP-SA-02 | Section 8.1.2, pp. 153-170 | 12/31/2025 | Liberty implemented SRP on 15 circuits in 2024, meeting its 2024 WMP target. Liberty installed fault indicators on all 15 circuits enabled with SRP in 2024, exceeding its target of 10 fault indicators. Liberty installed two automatic reclosers in 2024 and installed the other two targeted reclosers in Q1 2025. Liberty will continue to implement SRP on its targeted circuits in 2025. |
| | Continue to install covered conductor in high fire risk areas at a reduced rate while we gather better data on the risk spend efficiency of this program. | 3 | WMP-GDOM-GH-01 | Section 8.1.2, pp. 153-170 | Ongoing | Liberty installed 3.9 miles of covered conductor in 2024. A target reduction for covered conductor in 2024 from 5.61 miles to 3.9 miles was proposed in Liberty's 2024 Change Order Request. The target reduction was due to a change in strategic direction that prioritized Liberty’s SRP Program as an expedited wildfire mitigation during the current WMP cycle. Liberty covered more of its system with SRP over a shorter time and anticipates that this change will reduce wildfire risk within the current WMP cycle. Additionally, Liberty increased its traditional overhead hardening WMP initiative target from 2.0 miles to 3.5 miles as an offset of the reduced covered conductor installation. |
| | Continue to underground conductor in high fire risk areas where economically feasible. Undergrounding is considered as an alternative for any future project. | 3 | WMP-GDOM-GH-02 | Section 8.1.2, pp. 153-170 | Ongoing | Liberty did not complete any undergrounding in 2024. A target reduction for undergrounding in 2024 from 1.3 miles to 0.0 miles was proposed in Liberty's 2024 Change Order Request. The target reduction was based on project delays and permitting issues. In 2023, Liberty was unable to find a civil contractor that would meet the budget for the Tahoe Vista Rule 20 project planned for 2023. Liberty adjusted its undergrounding plans to focus on the Tahoe Vista Rule 20 project during the current WMP cycle and is currently working with Placer County, CalTrans, and Civil Contractors to replan the project for a 2025 build. |
| | Replace or repair poles in territory that have been deemed necessary by our system surveys. | 3 | WMP-GDOM-GH-03 | Section 8.1.2, pp. 153-170 | Ongoing | Liberty completed 823 pole replacements in 2024, exceeding its 2024 WMP target of 400 pole replacements. |
| | Continue to rebuild or repair high priority overhead conductor in territory to address aging infrastructure and help with reliability and wildfire mitigation. | 3 | WMP-GDOM-GH-05 | Section 8.1.2.5, pp. 162-163 | Ongoing | Liberty completed 3.5 miles of traditional overhead hardening in 2024, meeting its 2024 WMP target. |
| | Pilot the resonant grounding or “Swedish neutral” system on one substation within three years, test its risk spend efficiency and effectiveness. | 3 | WMP-GDOM-GH-06 | Section 8.1.2, pp. 153-170 | TBD | In Liberty's 2025 WMP Update, Liberty explained that the objective completion date for piloting the Swedish neutral technology was delayed to assess future cost and resource needs. Liberty is designing its substation rebuilds with provisions to potentially install Swedish neutral systems where possible if Liberty chooses to pursue this technology. |
| | Continue to consider microgrids, and line removal as an alternative solution to help with wildfire mitigation. Currently planning to bring a new microgrid online along with line removal in 2024. | 3 | WMP-GDOM-GH-07; WMP-GDOM-GH-09 | Section 8.1.2, pp. 153-170 | Ongoing | Liberty did not complete a microgrid and associated line removal in 2024. A target reduction for microgrids in 2024 from 1 microgrid to 0 microgrids was proposed in Liberty's 2024 Change Order Request. The target reduction was due to a change in strategic direction that replaced the planned microgrid project with a covered conductor installation project. Upon further assessment of the planned microgrid project, the expected size, costs, and lead times for the microgrid were higher than anticipated. |
| | Continue to make progress on tree attachment removals and replacing open wire/grey wire within territory yearly. | 3 | WMP-GDOM-GH-12a; WMP-GDOM-GH-12e | Section 8.1.2, pp. 153-170 | Ongoing | Liberty completed 98 tree attachment removals in 2024, exceeding its 2024 WMP target of 60 tree attachment removals. Liberty also completed 7.4 miles of open wire/grey wire replacement, exceeding its 2024 WMP target of 5.1 miles. |
| | Complete installation of animal guards or “green jackets” on exposed substation equipment. | 3 | WMP-GDOM-GH-12c | Section 8.1.2, pp. 153-170 | 12/31/2025 | Liberty did not complete its two targeted animal guard installations in 2024 due to delays in material procurement. Liberty plans to complete both targeted animal guard installations from 2024 prior to fire season in 2025. |
| | Include LiDAR inspections, covered conductor inspections, infrared inspections and drone inspections in detailed asset inspections or other discretionary asset inspections. | 3 | WMP-GDOM-AI-01; WMP-GDOM-AI-04 | Section 8.1.3, pp. 171-178 | 12/31/2025 | In 2023, Liberty completed 0.1 miles of fixed wing drone infrared inspections on its transmission assets. In 2024, Liberty completed one mile of drone inspections for outage management and completed a LiDAR inspection of its system. Additionally, in 2024 Liberty included the following additional covered conductor specific conditions to its detailed asset inspection checklist: water intrusion, splice covers, surface damage/bulging, and bracket placement. |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2024 |
|-----------------------|--|------------------------|--|--|--|--|
| | Include intrusive pole inspections and substation inspections in Asset Inspection QA/QC program and increase the percentage of QA/QC to 12% for detailed inspections. | 3 | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-05; WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178 | 12/31/2025 | In 2024, Liberty increased its QA/QC target to 12% for detailed asset inspections. Liberty completed 12% QA/QC of detailed asset inspections in 2024, meeting its 2024 WMP target. |
| | Continue to install covered conductor in high fire risk areas at a reduced rate while we gather better data on the risk spend efficiency of this program. | 10 | WMP-GDOM-GH-01 | Section 8.1.2, pp. 153-170 | Ongoing | See Liberty's response to the same 3-year objective. Liberty plans to continue to assess installing covered conductor in high fire risk areas as a wildfire mitigation alternative over the 10-year time period. |
| | Continue to underground conductor in high fire risk areas where economically feasible. Undergrounding is considered as an alternative for any future project. | 10 | WMP-GDOM-GH-02 | Section 8.1.2, pp. 153-170 | Ongoing | See Liberty's response to the same 3-year objective. Liberty plans to continue to assess undergrounding in high fire risk areas as a wildfire mitigation alternative over the 10-year time period. |
| | Replace or repair poles in territory that have been deemed necessary by our system surveys. | 10 | WMP-GDOM-GH-03 | Section 8.1.2, pp. 153-170 | Ongoing | See Liberty's response to the same 3-year objective. Liberty plans to continue to replace and repair poles in its territory deemed necessary by inspections over the 10-year time period. |
| | Continue to rebuild or repair high priority overhead conductor in territory to address aging infrastructure and help with reliability and wildfire mitigation. | 10 | WMP-GDOM-GH-05 | Section 8.1.2.5, pp. 162-163 | Ongoing | See Liberty's response to the same 3-year objective. Liberty plans to continue to assess traditional overhead hardening as a wildfire mitigation alternative over the 10-year time period. |
| | Continue to consider microgrids, and line removal as an alternative solution to help with wildfire mitigation. Currently planning to bring a new microgrid online along with line removal in 2024. | 10 | WMP-GDOM-GH-07; WMP-GDOM-GH-09 | Section 8.1.2, pp. 153-170 | Ongoing | See Liberty's response to the same 3-year objective. Liberty plans to continue to assess microgrids and the associated line removal as wildfire mitigation alternatives over the 10-year time period. |
| | Continue to pilot and test effectiveness of Swedish Neutral systems and build out this initiative more if successful. | 10 | WMP-GDOM-GH-06 | Section 8.1.2, pp. 153-170 | Ongoing | See Liberty's response to the same 3-year objective. |
| | Continuous improvement of Asset Inspection programs as technology offers improvements. | 10 | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-04; WMP-GDOM-AI-05; WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178 | Ongoing | Liberty plans to continually improve its asset inspection programs as technology offers improvements over the 10-year time period. |
| | Include risk analysis for prioritization of Asset Inspection programs. | 10 | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-04; WMP-GDOM-AI-05; WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178 | Ongoing | In its 2025 WMP Update, Liberty demonstrated that its existing asset inspection program adequately addresses risk and would not significantly reduce risk by increasing inspection frequency. Liberty will complete a similar analysis as risk models are updated. |
| Vegetation Management | Complete vegetation risk modeling | 3 | Clearance, VFM-05; Fall-In Mitigation, VFM-06 | Section 6, pp. 62-111 | December 2025 | Liberty began risk modeling of its system in 2024 and incorporated vegetation management into the model. The vegetation management inputs include historical tree inventories, LiDAR data, and maintenance history to identify risk reduction. |
| | Complete fall-in risk scoring model pilot | 3 | Fall-In Mitigation, VFM-06; High-Risk Species, VFM-07 | None in the 2023 WMP; in development | December 2025 | Liberty conducted an analysis of a fall-in risk scoring model derived through LiDAR inspections in 2023 and concluded the assessment in December of 2023. |
| | Implement IVM monitoring program | 10 | Fire Resilient Rights-of-Way, VFM-04; | Section 8.2.2, pp. 210-221 Section 8.2.3, pp. 222-234 | December 2032 | Liberty implemented an IVM monitoring program by establishing monitoring plots on sections of its distribution and transmission lines. |
| | Develop Utility Arborist training program for Liberty's service area | 10 | Environmental Permitting, Managing Community Impacts, and Program | None in the 2023 WMP; in development | December 2032 | Liberty developed a series of three online training modules for arborists in 2024. Work continued on three additional online training modules in 2024 that are planned to be released in 2025. |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2024 |
|------------------------|---|------------------------|----------------------------------|----------------------------------|--|---|
| | | | Development Activities, ESG-01 | | | |
| Situational Awareness | Determine weather station network capacity | 3 | WMP-SA-01 | Section 8.3.2, pp. 260-264 | 2023 | Liberty had analysis of its network completed in 2024 and provided that data to its weather station vendor for analysis to determine the need for any additional weather stations. |
| | Implement maintenance program for weather stations | 3 | WMP-SA-01 | Section 8.3.2, pp. 260-264 | 2023 | Liberty implemented a maintenance program for weather stations in 2024. |
| | Research emerging technologies for future fault detection pilot programs | 3 | WMP-SA-02 | None in 2023 WMP; in development | Not known | The University of Nevada Reno ("UNR") completed a Fire Mitigation Protection System Study for Liberty that looked at High Impedance Fault Detection ("HIFD"). The study recommended that Liberty should pursue a fast trip or SRP scheme to reduce fire risk. Liberty implemented its SRP Program in 2024. |
| | Work with AlertWildfire to own and operate cameras to track smoke and fires | 3 | WMP-SA-03 | Section 8.3.4, pp. 269-272 | 2023 | Liberty is working with University of Nevada at Reno (UNR) to execute MSA for sponsoring cameras. In 2024, UNR completed view shed analysis to propose new camera locations for Liberty's territory. The cameras would be owned and operated by UNR and installation and maintenance costs would be sponsored by Liberty. |
| | Implement new technologies if available (i.e., AI smoke detection) to identify ignitions more quickly | 10 | WMP-SA-03 | Section 8.3.4, pp. 269-272 | Not known | Liberty has not identified new technologies to implement on its system and is continuing to work towards improving wildfire camera network for AI smoke detection through the Alert West network. |
| | Improve weather forecasting capabilities as models improve or additional data becomes available | 10 | WMP-SA-01 | Section 8.3.2, pp. 260-264 | Not known | Liberty has improved weather forecasting abilities by procuring Technosylva Wildfire Analyst tools. |
| Emergency Preparedness | Update workforce training on incident Command System ("ICS") | 3 | WMP-EP-01 | Section 8.4.2.2, pp. 294-301 | June 2023 | All Incident Management Team members have received training through Liberty's Learning Management System (LMS). LMS module addresses Incident Command response and is based on the FEMA ICS 100 and ICS 200 courses. Training participation is assigned and tracked through the LMS system. |
| | Ongoing Maintenance of Emergency Response Plans | 3 | WMP-EP-02 | Section 8.4.2, pp. 290-309 | Annual (June 2024 and June 2025) | Emergency Management maintains an All Hazards Emergency Response Plan. The main plan details emergency response procedures and separate annexes or play books address, Wildfire, Winter Storms, and Public Safety Power Shutoffs. |
| | Continued engagement with local stakeholders to prepare for and respond to fire-related events | 3 | WMP-EP-03 | Section 8.4.2, pp. 290-309 | Annual (June 2024 and June 2025) | Liberty engages with local stake holders to prepare for and respond to fire related events. This includes but is not limited to participation in local fire and safety fairs, and Fire Department community outreach meetings. In addition, Liberty conducts a Public Safety Workshop for all Public Safety Partners on an annual basis. |
| | Enhanced documentation and use of lessons learned to update plans | 3 | WMP-EP-04 | Section 8.4.3, pp. 310-326 | Annual (June 2024 and June 2025) | Individual Emergency Response Plan annexes are increased in granularity through Liberty Utilities' Lessons Learned Program. Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are subsequently updated to reflect lessons learned and increase granularity. |
| | Ongoing Maintenance of Emergency Response Plans | 10 | WMP-EP-02 | Section 8.4.2, pp. 290-309 | Ongoing | Emergency Management maintains an All Hazards Emergency Response Plan. The main plan details emergency response procedures and separate annexes or play books address, Wildfire, Winter Storms, and Public Safety Power Shutoffs. |
| | Continued engagement with local stakeholders to prepare for and respond to fire-related events | 10 | WMP-EP-03 | Section 8.4.2, pp. 290-309 | Ongoing | Liberty engages with local stake holders to prepare for and respond to fire related events. This includes but is not limited to participation in local fire and safety fairs, and Fire Department community outreach meetings. In addition, Liberty conducts a Public Safety Workshop for all Public Safety Partners on an annual basis. |
| | Enhanced documentation and use of lessons learned to update plans | 10 | WMP-EP-04 | Section 8.4.3, pp. 310-326 | Ongoing | Individual Emergency Response Plan annexes are increased in granularity through Liberty's Lessons Learned Program. Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are subsequently updated to reflect lessons learned and increase granularity. |
| | Increase granularity and customization of response plans | 10 | WMP-EP-05 | Section 8.4.2, pp. 290-309 | January 2030 | Each activation of the EOC either for exercises or for events is reviewed by the Incident Management Team and documented in an After Action Report using the HSEEP format. Emergency Response Plans are subsequently updated to reflect lessons learned and increase granularity of the plans. |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2024 |
|--------------------|--|------------------------|----------------------------------|------------------------------|--|--|
| Community Outreach | Implement planned communication channels and technologies with customers, community, and stakeholders. | 3 | WMP-CO-03 | Section 8.5.2, pp. 354-359 | May 2024 | Liberty's wildfire mitigation efforts and PSPS education are shared in our customer communications channels: emails, social media, direct mail, and website throughout the year. In addition, Liberty purchases digital ads May-October geo-targeting our customers. Liberty purchases print ads and radio May-October, and participates throughout the year in community outreach efforts as well. |
| | Engage Community Based Organizations and expand network of contacts in each area of Liberty service territory, including South Lake Tahoe, North Lake Tahoe, Coleville/Walker, and Loyalton/Portola communities. | 3 | WMP-CO-03 | Section 8.5.2, pp. 354-359 | Ongoing | Liberty continued to network with local organizations in 2024, participating in Community Collaborative meetings in both North and South Lake Tahoe communities, participating in collaborative community outreach events throughout the service territory, and holding targeted Community Based Organization presentations regarding PSPS preparedness, AFN self-identification, and customer assistance program information. |
| | Work collaboratively with CBO networks to support, educate, notify, and prepare AFN communities. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty continued to network with local organizations in 2024, participating in Community Collaborative meetings in both North and South Lake Tahoe communities, participating in collaborative community outreach events throughout the service territory, and holding targeted Community Based Organization presentations regarding PSPS preparedness, AFN self-identification, and customer assistance program information. Entities supporting AFN communities are also included in PSPS preparedness tabletop exercises. |
| | Work collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty worked collaboratively in 2024 with Public Safety Partners across the service territory through inclusion in preparedness planning, presentations, community outreach, and direct communications. |
| | Support bilingual outreach through the utilization of bilingual Outreach Coordinator. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty's Outreach Coordinator supported bilingual outreach efforts throughout 2024, including Spanish language presentations and Spanish language support of customer assistance program enrollment, ultimately supporting AFN customer identification. |
| | Identify improvements to overall accessibility of information available to AFN customers. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty continued to consider accessibility in communications in 2024, utilizing targeted direct mailing efforts to all identified AFN customers regarding PSPS preparedness and customer assistance program information. Liberty also provides preparedness information to vulnerable senior populations through a targeted shelf-stable meal box effort through collaboration with local senior nutrition programs annually. Liberty considers AFN categories in outreach planning, working to be present and participate in collaborative outreach through trusted community based organization networks. |
| | Encourage self-identification of AFN customers through targeted outreach and communications. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | AFN self-ID forms are shared with local organizations, at outreach events, Community Resource Centers, and are available on the Liberty website in both English and Spanish. Customer assistance program enrollment also informs AFN identification of customers, as well as date of birth information in Liberty's system. Liberty also encourages AFN identification through ad campaigns. |
| | Regular PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy. | 3 | WMP-CO-03 | Section 8.5.4, pp. 363-366 | Ongoing | Regular PSPS coordination meetings are conducted with Tahoe Donner Public Utility District and NV Energy. A virtual meeting is conducted weekly during fire season and every other week during the off season. |
| | Effective stakeholder communication through tailored approaches for outreach, engagement and information exchange with customers, communities and stakeholders based on various groups' unique needs. Identify emerging channels and technologies to better communicate with customers, community, and stakeholders. | 10 | WPM-CO-01; Best practice sharing | Section 8.5.2, pp. 354-359 | June 2026 | Liberty's wildfire mitigation efforts and PSPS education are shared in our customer communications channels: emails, social media, direct mail, and website throughout the year. In addition, Liberty purchases digital ads May-October geo-targeting our customers. Liberty purchases print ads and radio May-October and participates throughout the year in community outreach efforts as well. |
| | Engage CBOs and further expand network of contacts in each area of Liberty service territory, including South Lake Tahoe, North Lake Tahoe, Coleville/Walker, and Loyalton/Portola communities. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty continued to network with local organizations in 2024, participating in Community Collaborative meetings in both North and South Lake Tahoe communities, participating in collaborative community outreach events throughout the service territory, and holding targeted Community Based Organization presentations regarding PSPS preparedness, AFN self-identification, and customer assistance program information. |
| | Continue to work collaboratively with CBO networks to support, educate, notify, and prepare AFN communities. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty continued to network with local organizations in 2024, participating in Community Collaborative meetings in both North and South Lake Tahoe communities, participating in collaborative community outreach events throughout the service territory, and holding targeted Community Based Organization presentations regarding PSPS preparedness, AFN self-identification, and customer assistance program information. Entities supporting AFN communities are also included in PSPS preparedness tabletop exercises. |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Summary of Liberty's Progress Made in 2024 |
|--------------|--|------------------------|----------------------------------|------------------------------|--|--|
| | Continue to work collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty worked collaboratively in 2024 with Public Safety Partners across the service territory through inclusion in preparedness planning, presentations, community outreach, and direct communications. |
| | Continue to support bilingual outreach efforts. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty's Outreach Coordinator supported bilingual outreach efforts throughout 2024, including Spanish language presentations and Spanish language support of customer assistance program enrollment, ultimately supporting AFN customer identification. |
| | Identify improvements to overall accessibility of information available to AFN. customers | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Liberty continued to consider accessibility in communications in 2024, utilizing targeted direct mailing efforts to all identified AFN customers regarding PSPS preparedness and customer assistance program information. Liberty also provides preparedness information to vulnerable senior populations through a targeted shelf-stable meal box effort through collaboration with local senior nutrition programs annually. Liberty considers AFN categories in outreach planning, working to be present and participate in collaborative outreach through trusted community based organization networks. |
| | Continue to encourage self-identification of AFN status through targeted outreach efforts and communications. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | AFN self-ID forms are shared with local organizations, at outreach events, Community Resource Centers, and are available on the Liberty website in both English and Spanish. Customer assistance program enrollment also informs AFN identification of customers, as well as date of birth information in Liberty's system. Liberty also encourages AFN identification through ad campaigns. |
| | Ongoing PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy. | 10 | WMP-CO-03 | Section 8.5.4, pp. 363-366 | Ongoing | Regular PSPS coordination meetings are conducted with Tahoe Donner Public Utility District and NV Energy. Meetings are conducted every two weeks during fire season and every four weeks during the off season. |

C. Liberty's assessment of completion of three- and 10-year objectives listed in the tables in Section 8 of Liberty's 2023-2025 WMP.

Liberty's assessment of its completion of its three- and 10-year objectives detailed in Section 8 of its 2023-2025 WMP is included in Table 3 below.

Table 3: Assessment of Completion of 2023-2025 WMP Section 8 Detailed Objectives

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification | Explanation of Method of Verification Use | Assessment of Completing Objective | Carried Over from Previous Compliance Years? | Explanation for Objectives Not Met | Corrective Actions? |
|---|---|------------------------|---|------------------------------|--|----------------------------------|---|--|--|--|------------------------------------|---------------------|
| Grid Design, Operations and Maintenance | Build out a Sensitive Relay Profile (“SRP”) program throughout Liberty’s system to reduce ignition risk. Install additional reclosers to help with sectionalization. Install additional fault indicators to help with reliability | 3 | WMP-GDOM-GO-01; WMP-GDOM-GH-08; WMP-SA-02 | Section 8.1.2, pp. 153-170 | 12/31/2025 | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to install covered conductor in high fire risk areas at a reduced rate while we gather better data on the risk spend efficiency of this program. | 3 | WMP-GDOM-GH-01 | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to underground conductor in high fire risk areas where economically feasible. Undergrounding is considered as an alternative for any future project. | 3 | WMP-GDOM-GH-02 | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Replace or repair poles in territory that have been deemed necessary by our system surveys. | 3 | WMP-GDOM-GH-03 | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to rebuild or repair high priority overhead conductor in territory to address aging infrastructure and help with reliability and wildfire mitigation. | 3 | WMP-GDOM-GH-05 | Section 8.1.2.5, pp. 162-163 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Pilot the resonant grounding or “Swedish neutral” system on one substation within three years, test its risk spend efficiency and effectiveness. | 3 | WMP-GDOM-GH-06 | Section 8.1.2, pp. 153-170 | TBD | TBD | Annual WMP filings; QDR and GIS submissions | If completed, Liberty will include information on the pilot in its annual WMP filings and QDR. | TBD - In Liberty's 2025 WMP Update, Liberty explained that the objective completion date for piloting the Swedish neutral technology was delayed to assess future cost and resource needs. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to consider microgrids, and line removal as an alternative solution to help with wildfire mitigation. Currently planning to bring a new microgrid online along with line removal in 2024. | 3 | WMP-GDOM-GH-07; WMP-GDOM-GH-09 | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to make progress on tree attachment removals and replacing open wire/grey wire within territory yearly. | 3 | WMP-GDOM-GH-12a; WMP-GDOM-GH-12e | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Complete installation of animal guards or “green jackets” on exposed substation equipment. | 3 | WMP-GDOM-GH-12c | Section 8.1.2, pp. 153-170 | 12/31/2025 | Ongoing | Annual WMP filings | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification | Explanation of Method of Verification Use | Assessment of Completing Objective | Carried Over from Previous Compliance Years? | Explanation for Objectives Not Met | Corrective Actions? |
|--------------|--|------------------------|--|------------------------------|--|--|--|---|--|--|------------------------------------|---------------------|
| | Include LiDAR inspections, covered conductor inspections, infrared inspections and drone inspections in detailed asset inspections or other discretionary asset inspections. | 3 | WMP-GDOM-AI-01; WMP-GDOM-AI-04 | Section 8.1.3, pp. 171-178 | 12/31/2025 | 2024 | Annual WMP filings; QDR and GIS submissions | Liberty includes completed inspections in its QDR. Liberty's asset inspection checklist is contained in its Fulcrum database. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Include intrusive pole inspections and substation inspections in Asset Inspection QA/QC program and increase the percentage of QA/QC to 12% for detailed inspections. | 3 | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-05; WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178 | 12/31/2025 | Ongoing; completed 12% target in 2024. | Annual WMP filings; QDR and GIS submissions; QA/QC documentation | Liberty includes completed inspections in its QDR. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to install covered conductor in high fire risk areas at a reduced rate while we gather better data on the risk spend efficiency of this program. | 10 | WMP-GDOM-GH-01 | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 10-year time period. | N/A | N/A |
| | Continue to underground conductor in high fire risk areas where economically feasible. Undergrounding is considered as an alternative for any future project. | 10 | WMP-GDOM-GH-02 | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 10-year time period. | N/A | N/A |
| | Replace or repair poles in territory that have been deemed necessary by our system surveys. | 10 | WMP-GDOM-GH-03 | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 10-year time period. | N/A | N/A |
| | Continue to rebuild or repair high priority overhead conductor in territory to address aging infrastructure and help with reliability and wildfire mitigation. | 10 | WMP-GDOM-GH-05 | Section 8.1.2.5, pp. 162-163 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 10-year time period. | N/A | N/A |
| | Continue to consider microgrids, and line removal as an alternative solution to help with wildfire mitigation. Currently planning to bring a new microgrid online along with line removal in 2024. | 10 | WMP-GDOM-GH-07; WMP-GDOM-GH-09 | Section 8.1.2, pp. 153-170 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions | Liberty includes completed projects in its QDR and quarterly GIS reporting. | On track. | Yes, objective is applicable to the 10-year time period. | N/A | N/A |
| | Continue to pilot and test effectiveness of Swedish Neutral systems and build out this initiative more if successful. | 10 | WMP-GDOM-GH-06 | Section 8.1.2, pp. 153-170 | Ongoing | TBD | Annual WMP filings; QDR and GIS submissions | If completed, Liberty will include information on the pilot in its annual WMP filings and QDR. | TBD - In Liberty's 2025 WMP Update, Liberty explained that the objective completion date for piloting the Swedish neutral technology was delayed to assess future cost and resource needs. | Yes, objective is applicable to the 10-year time period. | N/A | N/A |
| | Continuous improvement of Asset Inspection programs as technology offers improvements. | 10 | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-04; WMP-GDOM-AI-05; WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178 | Ongoing | Ongoing | Annual WMP filings; QDR and GIS submissions; QA/QC documentation | Liberty includes information on asset inspection programs in its annual WMP. | On track. | Yes, objective is applicable to the 10-year time period. | N/A | N/A |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification | Explanation of Method of Verification Use | Assessment of Completing Objective | Carried Over from Previous Compliance Years? | Explanation for Objectives Not Met | Corrective Actions? |
|-----------------------|---|------------------------|--|--|--|----------------------------------|---|---|------------------------------------|--|------------------------------------|---------------------|
| | Include risk analysis for prioritization of Asset Inspection programs. | 10 | WMP-GDOM-AI-01; WMP-GDOM-AI-02; WMP-GDOM-AI-04; WMP-GDOM-AI-05; WMP-GDOM-AI-06 | Section 8.1.3, pp. 171-178 | Ongoing | Ongoing | Annual WMP filings | Liberty includes information on asset inspection programs in its annual WMP. | On track. | Yes, objective is applicable to the 10-year time period. | N/A | N/A |
| Vegetation Management | Complete vegetation risk modeling | 3 | Clearance, VFM-05; Fall-In Mitigation, VFM-06 | Section 6, pp. 62-111 | December 2025 | Ongoing | WMP reporting, report from 3rd party project manager, QA/QC | Liberty includes information on risk modeling in its annual WMP. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Complete fall-in risk scoring model pilot | 3 | Fall-In Mitigation, VFM-06; High-Risk Species, VFM-07 | None in the 2023 WMP; in development | December 2025 | Completed December 2023 | WMP reporting, methodology provided by vendor, internal analysis and report | Liberty documented its analysis of this objective. | Completed. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Implement IVM monitoring program | 10 | Fire Resilient Rights-of-Way, VFM-04; | Section 8.2.2, pp. 210-221 Section 8.2.3, pp. 222-234 | December 2032 | Ongoing | IVM monitoring data and records | Field data collection software is used to record IVM monitoring data for analysis. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Develop Utility Arborist training program for Liberty's service area | 10 | Environmental Permitting, Managing Community Impacts, and Program Development Activities, ESG-01 | None in the 2023 WMP; in development | December 2032 | Ongoing | Training records and documentation of training program | Arborist training program is documented and completion of training modules is tracked and recorded. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| Situational Awareness | Determine weather station network capacity | 3 | WMP-SA-01 | Section 8.3.2, pp. 260-264 | 2023 | Ongoing | Weather station optimization tool results | Analysis showing coverage of system with existing weather station network is used to determine need for additional stations. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Implement maintenance program for weather stations | 3 | WMP-SA-01 | Section 8.3.2, pp. 260-264 | 2023 | Completed | Invoices, work orders | Documentation of weather station inspections, calibrations, maintenance, and repairs for each weather station | Completed. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Research emerging technologies for future fault detection pilot programs | 3 | WMP-SA-02 | None in 2023 WMP; in development | Not known | Ongoing | Annual WMP | Liberty includes relevant information in Situational Awareness Section of its Annual WMP and in response to Energy Safety Areas of Improvement. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Work with AlertWildfire to own and operate cameras to track smoke and fires | 3 | WMP-SA-03 | Section 8.3.4, pp. 269-272 | 2023 | Ongoing | Service agreement | Working with University of Nevada | On track. | Yes, objective is applicable to | N/A | N/A |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification | Explanation of Method of Verification Use | Assessment of Completing Objective | Carried Over from Previous Compliance Years? | Explanation for Objectives Not Met | Corrective Actions? |
|------------------------|---|------------------------|----------------------------------|------------------------------|--|----------------------------------|---|--|------------------------------------|--|------------------------------------|---------------------|
| | | | | | | | | Reno to execute contract. | | the 2023-2025 WMP cycle. | | |
| | Implement new technologies if available (i.e., AI smoke detection) to identify ignitions more quickly | 10 | WMP-SA-03 | Section 8.3.4, pp. 269-272 | Not known | Ongoing | Invoices, work orders, agreements | Documents evaluation or implementation of new technologies. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Improve weather forecasting capabilities as models improve or additional data becomes available | 10 | WMP-SA-01 | Section 8.3.2, pp. 260-264 | Not known | Ongoing | Program | Documentation of improved weather forecasting capabilities. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle | N/A | N/A |
| Emergency Preparedness | Update workforce training on incident Command System ("ICS") | 3 | WMP-EP-01 | Section 8.4.2.2, pp. 294-301 | June 2023 | Completed August 2023 | G.O. 166 | Learning Management System Completion Reports. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Ongoing Maintenance of Emergency Response Plans | 3 | WMP-EP-02 | Section 8.4.2, pp. 290-309 | Annual (June 2024 and June 2025) | Ongoing | Corporate Emergency Response Plan ("CEMP") | CEMP change log. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continued engagement with local stakeholders to prepare for and respond to fire-related events | 3 | WMP-EP-03 | Section 8.4.2, pp. 290-309 | Annual (June 2024 and June 2025) | Ongoing | CEMP | Meetings logged in the community outreach meeting tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Enhanced documentation and use of lessons learned to update plans | 3 | WMP-EP-04 | Section 8.4.3, pp. 310-326 | Annual (June 2024 and June 2025) | Ongoing | CEMP | After Action Reports. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Ongoing Maintenance of Emergency Response Plans | 10 | WMP-EP-02 | Section 8.4.2, pp. 290-309 | Ongoing | Ongoing | Change Log in Corporate Emergency Management Plan | CEMP change log. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continued engagement with local stakeholders to prepare for and respond to fire-related events | 10 | WMP-EP-03 | Section 8.4.2, pp. 290-309 | Ongoing | Ongoing | Wildfire Community Advisory Board Meetings as recorded in the Liberty Community Outreach Recording Document | Community outreach meeting tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Enhanced documentation and use of lessons learned to update plans | 10 | WMP-EP-04 | Section 8.4.3, pp. 310-326 | Ongoing | Ongoing | Change Log in Corporate Emergency Management Plan | After Action Reports. CEMP change log. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Increase granularity and customization of response plans | 10 | WMP-EP-05 | Section 8.4.2, pp. 290-309 | January 2030 | Ongoing | Existence of emergency plans based on type of emergency | Review of CEMP and associated Play books. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification | Explanation of Method of Verification Use | Assessment of Completing Objective | Carried Over from Previous Compliance Years? | Explanation for Objectives Not Met | Corrective Actions? |
|--------------------|--|------------------------|----------------------------------|------------------------------|--|----------------------------------|---|---|------------------------------------|--|------------------------------------|---------------------|
| Community Outreach | Implement planned communication channels and technologies with customers, community, and stakeholders. | 3 | WMP-CO-03 | Section 8.5.2, pp. 354-359 | May 2024 | Ongoing | Documentation of outreach. ¹ | Communication efforts are tracked in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Engage Community Based Organizations and expand network of contacts in each area of Liberty service territory, including South Lake Tahoe, North Lake Tahoe, Coleville/Walker, and Loyalton/Portola communities. | 3 | WMP-CO-03 | Section 8.5.2, pp. 354-359 | Ongoing | Ongoing | Documentation of instances of information sharing and in-person or virtual meetings with Community Based Organizations | Community based organization and community outreach is documented in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Work collaboratively with CBO networks to support, educate, notify, and prepare AFN communities. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Documentation of outreach efforts and collaborative events; documentation of CBO information sharing regarding upcoming events or program information updates | Community based organization and community outreach is documented in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Work collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | AFN Plan | Documentation in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Support bilingual outreach through the utilization of bilingual Outreach Coordinator. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Documentation of outreach including bilingual support | Community based organization and community outreach is documented in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Identify improvements to overall accessibility of information available to AFN customers. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Documentation of accessibility improvements as applicable | Liberty's AFN Plan summarizes improvements as applicable. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Encourage self-identification of AFN customers through targeted outreach and communications. | 3 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Assessment of identified AFN customer counts each quarter; Documentation of AFN Self-Id Tool content inclusion in communications | Community based organization and community outreach encouraging AFN awareness is documented in community outreach tracking document. Liberty's AFN web forms also track identification. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |

¹ Liberty erroneously included an incorrect method of verification for this objective in its 2023-2025 WMP and is providing a correct method of verification in this report.

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification | Explanation of Method of Verification Use | Assessment of Completing Objective | Carried Over from Previous Compliance Years? | Explanation for Objectives Not Met | Corrective Actions? |
|--------------|--|------------------------|----------------------------------|------------------------------|--|----------------------------------|---|--|------------------------------------|--|------------------------------------|---------------------|
| | Regular PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy. | 3 | WMP-CO-03 | Section 8.5.4, pp. 363-366 | Ongoing | Ongoing | Meeting notes | Documentation in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Effective stakeholder communication through tailored approaches for outreach, engagement and information exchange with customers, communities and stakeholders based on various groups' unique needs. Identify emerging channels and technologies to better communicate with customers, community, and stakeholders. | 10 | WPM-CO-01; Best practice sharing | Section 8.5.2, pp. 354-359 | June 2026 | Ongoing | Documented instances of collaboration between the electrical corporation and outside entities, including agendas, meeting minutes, and participant lists | Communication efforts are tracked in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Engage CBOs and further expand network of contacts in each area of Liberty service territory, including South Lake Tahoe, North Lake Tahoe, Coleville/Walker, and Loyalton/Portola communities. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Documentation of instances of information sharing and in-person or virtual meetings with Community Based Organizations | Community based organization and community outreach is documented in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to work collaboratively with CBO networks to support, educate, notify, and prepare AFN communities. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Documentation of outreach efforts and collaborative events; documentation of CBO information sharing regarding upcoming events or program information updates | Community based organization and community outreach is documented in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to work collaboratively with Public Safety Partners to support, educate, notify, and prepare AFN communities. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | AFN Plan | Documentation in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Continue to support bilingual outreach efforts. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Documentation of outreach including bilingual support | Community based organization and community outreach is documented in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Identify improvements to overall accessibility of information available to AFN. customers | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Documentation of customer survey feedback; Documentation of accessibility improvements as applicable | Liberty's AFN Plan summarizes improvements as applicable. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |

| WMP Category | WMP Objective | 3 or 10-year Objective | WMP Initiatives and Tracking IDs | WMP Section and Page Numbers | Completion Date Listed in Approved WMP | Date Liberty Completed Objective | Method of Verification | Explanation of Method of Verification Use | Assessment of Completing Objective | Carried Over from Previous Compliance Years? | Explanation for Objectives Not Met | Corrective Actions? |
|--------------|---|------------------------|----------------------------------|------------------------------|--|----------------------------------|--|---|------------------------------------|--|------------------------------------|---------------------|
| | Continue to encourage self-identification of AFN status through targeted outreach efforts and communications. | 10 | WMP-CO-03 | Section 8.5.3, pp. 360-363 | Ongoing | Ongoing | Assessment of identified AFN customer counts each quarter; Documentation of AFN Self-Id Tool content inclusion in communications | Community based organization and community outreach encouraging AFN awareness is documented in community outreach tracking document. Liberty's AFN web forms also track identification. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |
| | Ongoing PSPS coordination meetings with Tahoe Donner Public Utility District and NV Energy. | 10 | WMP-CO-03 | Section 8.5.4, pp. 363-366 | Ongoing | Ongoing | Meeting notes | Documentation in community outreach tracking document. | On track. | Yes, objective is applicable to the 2023-2025 WMP cycle. | N/A | N/A |

D. Liberty's assessment of completion of 2024 WMP initiative targets listed in the tables in Section 8 of Liberty's 2023-2025 WMP.

The required information regarding Liberty's assessment of its completion of 2024 WMP initiative targets listed in Section 8 of its 2023-2025 WMP is included in Table 4 below. Liberty provides its explanations for missed targets and any associated corrective actions in Section Di. below. Additionally, as stated in Liberty's 2023-2025 WMP, Liberty does not currently have sufficient information to calculate the risk reduction percentage achieved for its WMP initiatives.

Table 4: Assessment of Completion of 2024 WMP Initiative Targets

| WMP Initiative Activity | Initiative Tracking ID | Target Units | 2024 Target | Projected Target Completion Date | 2024 Actuals | Actual Target Completion Date | Method of Verification Explanation | Assessment of Target Completion Based on Verification Method | Carried over from Previous Compliance Years | Assessment of QA/QC |
|--|------------------------|---------------------------|-------------|----------------------------------|--------------|-------------------------------|---|--|---|---------------------|
| Covered conductor installation | WMP-GDOM-GH-01 | Circuit Miles | 5.6 | Q4 2024 | 3.9 | - | In addition to post-work verification of projects, Liberty reports completed projects in its QDR and quarterly GIS submissions to Energy Safety. Liberty utilizes the QDR and GIS data submissions to verify accuracy and consistency in its internal asset data updates (e.g., Fulcrum and GIS) capturing WMP initiative progress. | Missed target | No | - |
| Undergrounding of electric lines and/or equipment | WMP-GDOM-GH-02 | Circuit Miles | 1.3 | - | 0.0 | - | See response above to method of verification explanation for covered conductor initiative. | Missed target | No | - |
| Distribution pole replacements and reinforcements | WMP-GDOM-GH-03 | Poles | 400.0 | Q4 2024 | 823.0 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Exceeded target | No | - |
| Traditional overhead hardening | WMP-GDOM-GH-05 | Circuit Miles | 3.5 | Q4 2024 | 3.5 | Q1 2024 | See response above to method of verification explanation for covered conductor initiative. | Met target | No | - |
| Microgrids | WMP-GDOM-GH-07 | Microgrids | 1.0 | - | 0.0 | - | See response above to method of verification explanation for covered conductor initiative. | Missed target | No | - |
| Installation of system automation equipment | WMP-GDOM-GH-08 | Automatic Reclosers | 8.0 | Q4 2024 | 2.0 | - | See response above to method of verification explanation for covered conductor initiative. | Missed target | No | - |
| Line removal (in HFTD) | WMP-GDOM-GH-09 | Circuit Miles | 1.1 | - | 0.0 | - | See response above to method of verification explanation for covered conductor initiative. | Missed target | No | - |
| Tree attachment removals | WMP-GDOM-GH-12a | Tree Attachments | 60.0 | Q4 2024 | 98.0 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Exceeded target | No | - |
| Expulsion fuse replacement | WMP-GDOM-GH-12b | Expulsion Fuses | 500.0 | Q4 2024 | 750.0 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Exceeded target | No | - |
| Animal guards | WMP-GDOM-GH-12c | Animal Guards | 2.0 | Q4 2024 | 0.0 | - | See response above to method of verification explanation for covered conductor initiative. | Missed target | No | - |
| Open wire/grey wire | WMP-GDOM-GH-12e | Circuit Miles | 5.1 | Q4 2024 | 7.4 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Exceeded target | No | - |
| Substation Equipment Replacement | WMP-GDOM-GH-12f | Substations | 1.0 | Q4 2024 | 1.0 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Met target | No | - |
| Detailed inspections of distribution electric lines and equipment | WMP-GDOM-AI-01 | Circuit Miles | 264.2 | Q4 2024 | 363.5 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Exceeded target | No | Complete |
| Intrusive pole inspections | WMP-GDOM-AI-02 | Poles | 2,302.0 | Q4 2024 | 2,641.0 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Exceeded target | No | - |
| Patrol inspections of distribution electric lines and equipment | WMP-GDOM-AI-01 | Circuit Miles | 589.0 | Q4 2024 | 476.9 | - | See response above to method of verification explanation for covered conductor initiative. | Missed target | No | - |
| Other discretionary inspections of distribution electric lines and equipment | WMP-GDOM-AI-04 | Circuit Miles | 1.0 | Q4 2024 | 1.0 | Q4 2024 | See response above to method of verification explanation for covered conductor initiative. | Met target | No | - |
| Quality assurance / quality control of inspections | WMP-GDOM-AI-05 | % of Detailed Inspections | 12% | Q4 2024 | 12% | Q4 2024 | See response above to method of verification explanation for covered conductor initiative. | Met target | No | Complete |
| Substation inspections | WMP-GDOM-AI-06 | Substations | 42.0 | Q4 2024 | 71.0 | Q4 2024 | See response above to method of verification explanation for covered conductor initiative. | Exceeded target | No | - |
| Equipment settings to reduce wildfire risk | WMP-GDOM-GO-01 | # of circuits with SRP | 15.0 | Q4 2024 | 15.0 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Met target | No | - |

| WMP Initiative Activity | Initiative Tracking ID | Target Units | 2024 Target | Projected Target Completion Date | 2024 Actuals | Actual Target Completion Date | Method of Verification Explanation | Assessment of Target Completion Based on Verification Method | Carried over from Previous Compliance Years | Assessment of QA/QC |
|---|------------------------|---|-------------|----------------------------------|--|-------------------------------|---|--|---|---------------------|
| Vegetation Management Inspection Program - Detailed | WMP-VM-INSP-01 | Line Miles | 220.0 | Q4 2024 | 258.0 | Q4 2024 | Liberty utilizes QC of inspections, invoice review, documentation of span inspections, schedule and plan monitoring and tracking to verify. | Exceeded target | No | Complete |
| Vegetation Management Inspection Program - LiDAR | WMP-VM-INSP-03 | Line Miles | 700.0 | Q4 2024 | 700.0 | Q3 2024 | Liberty utilizes inspection data review to verify. | Met target | No | Complete |
| Pole Clearing | WMP-VM-VFM-01 | Subject Poles | 4,960.0 | Q4 2024 | 5,084.0 | Q3 2024 | Liberty utilizes post-work verification, completed work orders, invoice review, GIS pole and asset data updates, and field verification of poles. | Exceeded target | No | Complete |
| Wood and Slash Management | WMP-VM-VFM-02 | Acres | 280.0 | Q4 2024 | 349.5 | Q4 2024 | Liberty utilizes post-work verification, completed work orders, invoice review, and load tag reports to verify | Exceeded target | No | Complete |
| Fall-In Mitigation | WMP-VM-VFM-06 | Line Miles | 220.0 | Q4 2024 | 364.0 | Q4 2024 | Liberty utilizes post-work verification, completed work orders, and invoice review to verify. | Exceeded target | No | Complete |
| Quality Assurance and Quality Control | WMP-VM-QAQC-01 | Line Miles | 229.0 | Q4 2024 | 234.3 | Q3 2024 | Liberty utilizes QC inspection data, invoice review, scheduling of QC activities to align with maintenance work to verify. | Exceeded target | No | Complete |
| Grid monitoring systems | WMP-SA-02 | Circuits with Fault Indicators | 10.0 | Q4 2024 | 15.0 | Q3 2024 | See response above to method of verification explanation for covered conductor initiative. | Exceeded target | No | - |
| Collaboration and coordination with public safety partners | WMP-EP-02 | Continued engagement with local stakeholders and PSPs to prepare for and respond to fire-related event; Meet with Community Advisory Boards | | Q4 2024 | Engaged with stakeholders through participation in 16 community councils and working group meetings. | Q4 2024 | Liberty utilizes a communications tracker to track all WMP outreach. | Met target | No | - |
| Customer support in wildfire and PSPS emergencies | WMP-EP-05 | Conduct annual Incident Command training for all identified IC members. Hold Tabletop (1) and Functional (1) PSPS Exercises. Continue to implement Liberty's AFN Plan. Continue maintenance of emergency response plans. Update plans and procedures based on feedback and lessons learned from stakeholders and After Action Reports (AARs). | | Q4 2024 | 2024 PSPS exercise planning meetings took place on 4/4/2024 and 4/25/2024. Liberty conducted a tabletop exercise on 5/23/2024, and a full-scale exercise on 6/27/2024. Exercises and planning meetings included Cal OES, CPUC, CAL FIRE, and Office of Energy Infrastructure Safety (OEIS), along with other public safety partners, including government, critical facilities, and AFN Community advocates. IMT training was completed in Q4. | Q4 2024 | Liberty utilizes after action reports to verify exercise and planning meetings. | Met target | No | - |
| Public outreach and education awareness for wildfires, PSPS, outages from protective equipment and device settings, and vegetation management | WMP-CO-01 | Continue to survey customers, CBOs, community partners, and stakeholders to gauge awareness of Liberty assistance programs and of customer needs. Strengthen and expand AFN CBO partnerships. | | - | 33 in person events, 26 virtual events, and 57 rounds of emails, website posts, and social media posts focused on PSPS education and wildfire awareness, AFN outreach, and CBO collaboration. 4 sets of direct mail and bill inserts and sets of print and digital ads focused on customer and stakeholder outreach. | Q4 2024 | Liberty utilizes a communications tracker to track all WMP outreach. | Met target | No | - |

i. Liberty’s explanation for missed targets and corrective actions

Liberty missed seven WMP initiative targets in 2024. Liberty had proposed reduced targets for five of those seven WMP initiatives in its 2024 WMP Change Order Request,² in the absence of a 2024 WMP Update submission, which was not included in the Energy Safety WMP process for 2024. While those reduced targets were rejected by Energy Safety, Liberty did reach its proposed targets in four of those five WMP initiatives. As Liberty explained in its 2024 Change Order Request, Liberty projected that it would reduce wildfire risk within the current WMP cycle by pursuing the updated targets proposed in the 2024 Change Order Request. Liberty provides additional explanation for each WMP initiative with a missed target in 2024.

1) Covered Conductor Installation

Liberty installed 3.9 miles of covered conductor in 2024. Liberty proposed a target reduction for covered conductor in 2024 from 5.61 miles to 3.9 miles in its 2024 Change Order Request. The target reduction was due to a change in strategic direction that prioritized Liberty’s Sensitive Relay Profile (“SRP”) Program as an expedited wildfire mitigation during the current WMP cycle. Liberty covered more of its system with SRP over a shorter time and anticipated that this change would reduce wildfire risk within the current WMP cycle. Additionally, Liberty increased its traditional overhead hardening WMP initiative target from 2.0 miles to 3.5 miles as an offset of the reduced covered conductor installation. Liberty has not taken corrective actions associated with this missed target as the driver for missing the target was not having a 2024 WMP Update submission and associated opportunity to update 2024 targets as part of Energy Safety’s WMP process.

² Liberty Utilities 2024 WMP Update Change Order Request, May 28, 2024.

2) **Undergrounding of electric lines and/or equipment**

Liberty did not complete any undergrounding in 2024. Liberty proposed a target reduction for undergrounding in 2024 from 1.3 miles to 0.0 miles in its 2024 Change Order Request. The target reduction was based on project delays and permitting issues. In 2023, Liberty was unable to find a civil contractor that would meet the budget for the Tahoe Vista Rule 20 project planned for 2023. Liberty adjusted its undergrounding plans to focus on the Tahoe Vista Rule 20 project during the current WMP cycle and is currently working with Placer County, CalTrans, and civil contractors to replan the project scope to fit the budget for a 2025 build. Liberty has not taken corrective actions associated with this missed target as the driver for missing the target was not having a 2024 WMP Update submission and associated opportunity to update 2024 targets as part of Energy Safety's WMP process.

3) **Microgrids**

Liberty did not complete a microgrid and associated line removal in 2024. Liberty proposed a target reduction for microgrids in 2024 from one microgrid to zero microgrids in its 2024 Change Order Request. The target reduction was due to a change in strategic direction that replaced the planned microgrid project with a covered conductor installation project. Upon further assessment of the planned microgrid project, the expected size, costs, and lead times for the microgrid were higher than anticipated. Liberty has not taken corrective actions associated with this missed target as the driver for missing the target was not having a 2024 WMP Update submission and associated opportunity to update 2024 targets as part of Energy Safety's WMP process.

4) **Installation of system automation equipment**

Liberty installed two automatic reclosers in 2024. Liberty proposed a target reduction for automatic reclosers in 2024 from eight automatic reclosers to four automatic reclosers. The target reduction was due to Liberty's assessment of this WMP initiative in 2023. Liberty's initial 2023 target of eight automatic reclosers was an estimation of the number of reclosers that would be established as part

of Liberty's initial SRP program targeted for ten circuits. After completion of an SRP study conducted by the University of Nevada at Reno ("UNR") for Liberty in 2023 and evaluation of the study recommendations by Liberty's operations teams, Liberty determined that there is not value beyond five reclosers for the initial SRP program. Similarly, Liberty's 2024 target of eight automatic reclosers was an estimation of the number of reclosers that would be established as part of Liberty's SRP program in 2024. Liberty proposed to adjust its 2024 target for automatic recloser installation to be more consistent with the 2023 UNR Study results. Additionally, Liberty missed two of its targeted automatic reclosers in 2024 due to access issues. As a corrective action, Liberty completed both automatic recloser installations missed in 2024 in Q1 of 2025, prior to installing the additional four automatic reclosers targeted in 2025.

5) Line removal (in HFTD)

Liberty did not complete a microgrid and associated line removal in 2024. Liberty proposed a target reduction for line removal in 2024 from 1.1 miles to 0.0 miles in its 2024 Change Order Request. The target reduction was due to a change in strategic direction that replaced Liberty's planned microgrid project and associated line removal with a covered conductor installation project. Upon further assessment of the planned microgrid project, the expected size, costs, and lead times for the microgrid were higher than anticipated. Liberty has not taken corrective actions associated with this missed target as the driver for missing the target was not having a 2024 WMP Update submission and associated opportunity to update 2024 targets as part of Energy Safety's WMP process.

6) Animal Guards

Liberty did not complete its two targeted animal guard installations in 2024 due to delays in material procurement. As a corrective action, Liberty plans to complete both targeted animal guard installations from 2024 prior to fire season in 2025.

7) Patrol inspections of distribution electric lines and equipment

Liberty completed 476.9 miles of patrol inspections of distribution electric lines and equipment out of its targeted 589 miles. To offset this reduction in patrol inspections, Liberty completed 363.5 miles of detailed inspections of distribution electric lines and equipment, exceeding its target of 264.2 miles. As a corrective action, Liberty has updated and improved its detailed and patrol asset inspection schedules for 2025-2028.

II. LISTING OF ALL CHANGE ORDERS REQUESTED BY LIBERTY FOR 2024 WMP

Liberty submitted a 2024 WMP Change Order Request on May 28, 2024. Liberty requested changes to seven WMP initiative targets for 2024. Energy Safety issued its Decision on Liberty’s 2024 Change Order Request on July 1, 2024. Energy Safety’s decision approved two of Liberty’s requested WMP initiative target changes and rejected five of Liberty’s requested WMP initiative target changes. Refer to Table 5 below.

Table 5: Liberty 2024 WMP Change Order Request Target Change Requests

| 2024 WMP Initiative | 2024 Original Target | 2024 Updated Target (Requested) | Energy Safety Decision |
|---|-----------------------------|--|-------------------------------|
| Covered Conductor Installation | 5.61 miles | 3.9 miles | Rejected |
| Undergrounding of electric lines and/or equipment | 1.3 miles | 0.0 miles | Rejected |
| Traditional Overhead Hardening | 2.0 miles | 3.5 miles | Approved |
| Microgrids | 1 microgrid | 0 microgrids | Rejected |
| Installation of System Automation Equipment | 8 reclosers | 4 reclosers | Rejected |
| Line Removal (in HFTD) | 1.1 miles | 0.0 miles | Rejected |
| Equipment Settings to Reduce Wildfire Risk | - | 15 circuits with SRP | Approved |

III. 2024 WMP INITIATIVE SPEND

Liberty’s planned and actual expenditures for 2024 are included in Table 6 below.

Table 6: Planned and Actual WMP Expenditures in 2024

| WMP Initiative Activity | Initiative Tracking ID | Projected Expenditures (\$) | Actual Expenditures (\$) | Explanation for Difference (if greater than 10%) |
|--|------------------------|-----------------------------|--------------------------|---|
| Covered conductor installation | WMP-GDOM-GH-01 | 8,627,427 | 8,312,596 | - |
| Undergrounding of electric lines and/or equipment | WMP-GDOM-GH-02 | 8,482,680 | 46,067 | Liberty did not complete its initial 2024 WMP target for undergrounding. Refer to Section B of this report and Liberty's 2024 WMP Change Order Request. |
| Distribution pole replacements and reinforcements | WMP-GDOM-GH-03 | 7,413,000 | 20,147,051 | Liberty exceeded its 2024 WMP target for pole replacements by 106%. |
| Traditional overhead hardening | WMP-GDOM-GH-05 | 3,500,000 | 1,863,709 | Liberty completed its 2024 WMP target for traditional overhead hardening at a lower cost than initially projected. |
| Emerging grid hardening technology installations and pilot progress | WMP-GDOM-GH-06 | 3,050,000 | - | Liberty captured costs associated with implementing its SRP Program in WMP initiatives: WMP-GDOM-GH-08 and WMP-SA-02. |
| Microgrids | WMP-GDOM-GH-07 | 1,500,000 | - | Liberty did not complete its initial 2024 WMP target for microgrids. Refer to Section B of this report and Liberty's 2024 WMP Change Order Request. |
| Installation of system automation equipment | WMP-GDOM-GH-08 | 1,200,000 | 1,300,520 | - |
| Line removal (in HFTD) | WMP-GDOM-GH-09 | 500,000 | - | Liberty did not complete its initial 2024 WMP target for line removal. Refer to Section B of this report and Liberty's 2024 WMP Change Order Request. |
| Tree attachment removals | WMP-GDOM-GH-12a | 720,392 | 928,831 | Liberty exceeded its 2024 WMP target for tree attachment removals by 63%. |
| Expulsion fuse replacement | WMP-GDOM-GH-12b | - | 699,266 | Liberty's projected expenditures for its 2024 expulsion fuse replacements was TBD at time of WMP submission. |
| Animal guards | WMP-GDOM-GH-12c | 100,000 | - | Liberty did not complete its 2024 WMP target for animal guards. Refer to Section B of this report. |
| Open wire/grey wire | WMP-GDOM-GH-12e | 2,000,000 | 1,754,773 | Liberty completed its 2024 WMP target for open wire/grey wire at a lower cost than initially projected. |
| Substation equipment replacement | WMP-GDOM-GH-12f | - | 415,204 | Liberty did not project costs for substation equipment replacement as the work associated with this WMP initiative is determined by the results of substation inspections in the WMP compliance year. |
| Detailed inspections of distribution electric lines and equipment | WMP-GDOM-AI-01 | 125,000 | 536,670 | Liberty's initial projections for its 2024 asset inspection initiatives were inaccurate. |
| Intrusive pole inspections | WMP-GDOM-AI-02 | - | 147,642 | Liberty erroneously did not project costs for intrusive pole inspections in 2024. |
| Patrol inspections of distribution electric lines and equipment | WMP-GDOM-AI-03 | 15,000 | 29,629 | Liberty's initial projections for its 2024 asset inspection initiatives were inaccurate. |
| Other discretionary inspections of distribution electric lines and equipment | WMP-GDOM-AI-04 | 1,000,000 | 363,867 | Liberty's initial projections for its 2024 asset inspection initiatives were inaccurate. |
| Quality assurance / quality control of inspections | WMP-GDOM-AI-05 | 10,000 | 212,986 | Liberty's initial projections for its 2024 asset inspection initiatives were inaccurate. |
| Substation inspections | WMP-GDOM-AI-06 | 10,000 | - | Liberty's initial projections for its 2024 asset inspection initiatives were inaccurate. |
| Equipment maintenance and repair | WMP-GDOM-MR-01 | 500,000 | - | Liberty did not track costs in this WMP initiative in 2024. |
| Equipment settings to reduce wildfire risk | WMP-GDOM-GO-01 | 800,000 | - | Liberty captured costs associated with implementing its SRP Program in WMP initiatives: WMP-GDOM-GH-08 and WMP-SA-02. |
| Personnel work procedures and training in conditions of elevated fire risk | WMP-GDOM-GO-03 | 298,088 | - | Liberty did not track costs in this WMP initiative in 2024. |
| Vegetation Management Inspection Program - Detailed | WMP-VM-INSP-01 | 813,515 | 763,520 | - |
| Vegetation Management Inspection Program - Patrol | WMP-VM-INSP-02 | 257,500 | 595,415 | More patrol inspection work was performed than anticipated due to tree mortality. |
| Vegetation Management Inspection Program - LiDAR | WMP-VM-INSP-03 | 721,000 | 563,342 | Liberty worked with its vendor to develop specifications for deliverables that resulted in cost savings. |
| Pole Clearing | WMP-VM-VFM-01 | 494,400 | 565,771 | Liberty utilized a second vendor to complete pole clearing work which resulted in increased cost. |
| Wood and Slash Management | WMP-VM-VFM-02 | 1,545,000 | 1,267,478 | Liberty's initial projections for its 2024 Wood and Slash Management Program were inaccurate. |

| WMP Initiative Activity | Initiative Tracking ID | Projected Expenditures (\$) | Actual Expenditures (\$) | Explanation for Difference (if greater than 10%) |
|---|------------------------|-----------------------------|--------------------------|--|
| Substation Defensible Space | WMP-VM-VFM-03 | 20,600 | 62,321 | Liberty's initial projections for its 2024 Substation Defensible Space were inaccurate. |
| Fire-Resilient Right-of-Ways | WMP-VM-VFM-04 | 262,650 | 821,205 | Liberty's initial projections for Fire Resilient ROWS were inaccurate. |
| Clearance | WMP-VM-VFM-05 | 913,507 | 996,357 | - |
| Fall-In Mitigation | WMP-VM-VFM-06 | 7,982,500 | 3,254,922 | Liberty's initial projections for 2024 Fall-In Mitigation were inaccurate. Spend is dependent on work required in the field found from inspections. Liberty is maintaining targets for vegetation inspections, but mitigation work was lower than anticipated. |
| Emergency response vegetation management | WMP-VM-VFN-08 | - | 6,445 | Liberty does not project costs for this WMP initiative as work is uncertain at the time of WMP submission. |
| Vegetation Management Enterprise System | WMP-VM-ESG-01 | 418,185 | 577,570 | Liberty's initial projections for 2024 Enterprise System were inaccurate. |
| Quality Assurance and Quality Control | WMP-VM-QAQC-01 | 515,000 | 542,653 | - |
| Grid monitoring systems | WMP-SA-02 | 150,000 | 421,610 | Liberty exceeded its 2024 WMP target for fault indicators by 50% and costs were higher than expected. |
| Weather forecasting | WMP-SA-04 | - | 331,989 | Liberty incurred costs not forecasted for 2024, including weather station maintenance and calibration costs and implementations costs for Liberty's weather dashboard. |
| Ignition likelihood calculation | WMP-SA-06 | 683,807 | 1,224,799 | Costs were higher than projected due to increase in wildfire and PSPS risk modeling efforts. |
| Preparedness and planning for service restoration | WMP-EP-04 | 1,437,734 | 426,082 | Liberty's costs for this initiative were lower than projected for 2024 because all projected costs were not incurred. |
| Customer support in wildfire and PSPS emergencies | WMP-EP-05 | 105,000 | 122,974 | Liberty experienced its first actual PSPS event in 2024 and thus had higher than projected costs in 2024. |
| Public outreach and education awareness for wildfires, PSPS, outages from protective equipment and device settings, and vegetation management | WMP-CO-01 | 90,000 | 112,303 | Liberty included additional labor costs not initially forecasted in its 2024 WMP. |

IV. CONCLUSION

Liberty appreciates this opportunity to provide this 2024 WMP Annual Report on Compliance and looks forward to working with Energy Safety and other stakeholders to advance Liberty's wildfire mitigation planning efforts.

Respectfully submitted,

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