

LOG BEGINS JULY 8th, 2024.

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Liberty 2025 WMP Update Discovery Log

Last Updated:	Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question	Responses	Requestor	Date Received	Final Date Due	Date Sent	Links	Number of Attachments	Attachment Links	NDA Required?	WMP Section	Category	Subcategory
6/11/2025							Q01. Regarding Liberty's Substation Defensible Space Target (WMP-VM-VM-Q03): In Table 3.1 of its 2025 WMP Update, Liberty provided a "2025 Update Target" of 12 substations for Substation Defensible Space (WMP-VM-VM-Q03). In its 2025 Update under Section 3.2.15 "WMP-VM-VM-Q03: Substation Defensible Space," Liberty stated that "[t]he 2025 target for substation defensible space did not change. Liberty does not establish targets for its VM substation defensible space WMP initiative."2 Liberty's revised 2023-2025 WMP, submitted with the 2025 WMP Update, does not provide a target for this initiative in Table 8.17 "Liberty Vegetation Management Initiative Targets by Year" or in its narrative description of the Substation Defensible Space Initiative beyond the statement that there will be a "minimum of two site visits" annually per facility. a. What is Liberty's 2025 target for substation defensible space? Provide both the number and the unit. b. Provide the current version of Liberty's Post Work Verification Procedure (VM-Q4) including any updates related to the introduction of the new quality assurance (QA) assessment component of its Vegetation Management QA/QC program. c. Describe Liberty's new QA assessment sampling plan and provide any associated standard operating procedures. d. Provide a summary of the findings from the new QA assessment to date.	a. 12 substations. b. Liberty intends to perform two site visits per substation to perform vegetation treatments. c. Liberty performs the same maintenance described in its WMP during both site visits. d. The first treatment is planned to occur between June 1st and September 30th and the second treatment is planned to occur between October 1st and December 31st. e. Two treatments are intended to manage vegetation regrowth and debris accumulation effectively during Spring, Summer and Fall months. If vegetation re-growth or debris accumulation occurs inside substation footprints or perimeters between planned treatments, Liberty will schedule additional site visits as needed. f. Liberty's Post Work Verification Procedure (VM-Q4) defines QA and QC in the definitions section on page 1 and 2. Refer to supporting materials: DR002 - Question 1a and 1b. g. Refer to supporting materials: DR002 - Question 1a and 1b. h. Refer to supporting materials: DR002 - Question 1c, 1d, DR002 - Question 1e, 1f, and DR002 - Question 1g. i. Refer to supporting materials: DR002 - Question 1d.	Sara S. Moore	7/22/2024	7/25/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20OIS-P-WMP_2024-LU-001_Liberty%20Response_07242024.pdf				3	3.2.15	N/A
		OES	1	OES-P-WMP_2024-LU-001	1	OES-01-1.1	Regarding Liberty's new QA assessment component of its Vegetation Management QA/QC program: a. Provide Liberty's definition of quality assurance (QA) and how it differs from quality control (QC). b. Provide the current version of Liberty's Post Work Verification Procedure (VM-Q4) including any updates related to the introduction of the new quality assurance (QA) assessment component of its Vegetation Management QA/QC program. c. Describe Liberty's new QA assessment sampling plan and provide any associated standard operating procedures. d. Provide a summary of the findings from the new QA assessment to date.	a. Liberty expects to receive the final analysis from Eagle Rock Analytics by the end of 2024. b. Yes, Liberty will provide the final analysis in its next WMP submission or in response to stakeholder request.	Sara S. Moore	7/26/2024	7/31/2024	7/30/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20OIS-P-WMP_2024-LU-002_Liberty%20Response_07302024.pdf	5					
		OES	2	OES-P-WMP_2024-LU-002	1	OES-02-2.1	In Liberty's response to area for continued improvement LU-23-18 "Weather Station Optimization" Liberty indicated it has "engaged Eagle Rock Analytics to perform a weather station optimization analysis for its system to evaluate how well the network captures the diversity of climate conditions within Liberty's territory". a. When does Liberty expect to receive the final analysis from Eagle Rock Analytics? b. Will Liberty make this final analysis available to the public?	a. Liberty expects to receive the final analysis from Eagle Rock Analytics by the end of 2024. b. Yes, Liberty will provide the final analysis in its next WMP submission or in response to stakeholder request.	Sara S. Moore	9/6/2024	9/11/2024	9/11/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20OIS-P-WMP_2024-LU-003_Liberty%20Response_09112024.pdf						
		OES	3	OES-P-WMP_2024-LU-003	1	OES-03-3.1	Were the cost categories listed in Liberty's 2025 WMP Update (i.e., project permitting, community outreach, communications, and various vegetation management program development activities, as listed in Section 2.2.19.3) included in the projected expenditures in its 2023-2025 Base WMP? a. If they were not included, please describe how and why cost assumptions and expenditure categories (as listed in Section 2.2.19.3) have changed between its 2023-2025 Base WMP and its 2025 WMP Update. b. If they were included, please describe how cost assumptions for the categories listed in Section 2.2.19.3 have changed since the approval of Liberty's 2023-2025 Base WMP on February 5, 2024.	a. N/A. b. The cost assumptions regarding tracking and recording these categories have changed to capture all of the costs of project permitting within a single initiative. Previously some of the cost categories, mostly project permitting, were recorded as part of the costs of associated initiatives. For example, project permitting costs associated with fall-in mitigation work were projected and recorded within Liberty's fall-in mitigation WMP initiative. As of the 2025 WMP Update, Liberty will project and track all of the cost categories listed in WMP-VM-ESG-01 within that initiative.	Sara S. Moore	9/6/2024	9/11/2024	9/11/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20OIS-P-WMP_2024-LU-003_Liberty%20Response_09112024.pdf						
		OES	3	OES-P-WMP_2024-LU-003	2	OES-03-3.2	a. Please provide Liberty's current distribution detailed inspection checklist, referenced on page 42 of Liberty's 2025 WMP Update R1.	a. See below for Liberty's current distribution detailed inspection checklist: Condition codes for failed inspections: • Bare Equipment Jumpers • Clearance • Climbing Space • Crossarm Braces Falling Off • Crossarm Broken / Split / Loose • Crossarm Needs Replacing • Equipment Anchors • Foreign Objects on Poles	Jessica McHale	10/3/2024	10/8/2024	10/8/2024	Data Request OIS-P-WMP_2024-LU-004_Liberty%20Response_10082024.pdf						
		OES	4	OES-P-WMP_2024-LU-004	1	OES-04-4.1	a. In its 2025 WMP Update R1, Liberty lists a target change for initiative "WMP-GDOM-AI-05: Quality assurance / quality control of inspections," increasing from a 2025 Original Target of 3 percent to a 2025 Updated Target of 12 percent. However, in both Liberty's approved 2023-2025 Base WMP and its revised 2023-2025 Base WMP R6, the "Target 2025 % Unit" is listed as 12 percent for this initiative. i. Please confirm whether Liberty incorrectly listed 3 percent (instead of 12 percent) as the "2025 Original Target" in its 2025 WMP Update. j. If so, please confirm that there is no 2025 target change associated with initiative "WMP-GDOM-AI-05: Quality assurance/quality control of inspections."	a. Liberty confirms that it incorrectly listed 3 percent (instead of 12 percent) as the "2025 Original Target" in its 2025 WMP Update. 1. Liberty confirms that there is no 2025 target change associated with initiative "WMP-GDOM-AI-05: Quality assurance/quality control of inspections."	Jessica McHale	10/3/2024	10/8/2024	10/8/2024	Data Request OIS-P-WMP_2024-LU-004_Liberty%20Response_10082024.pdf						
		OES	4	OES-P-WMP_2024-LU-004	2	OES-04-4.2	a. Please provide the circuits or circuit segments planned to be undergrounded in 2025 as part of the Tahoe Vista project. i. Provide the percentage of the project circuit miles in the HTD Tier 3. ii. Provide the percentage of the project circuit miles in the HTD Tier 2. b. Please provide the fire risk score, asset risk scores, and composite risk scores for each circuit or circuit segment. i. Provide the percentage of the project circuit miles in the HTD Tier 3. ii. Provide the percentage of the project circuit miles in the HTD Tier 2. iii. Provide the fire risk score, asset risk scores, and composite risk scores for each circuit or circuit segment.	a. Circuit KBH5200 i. 0% ii. 100% iii. See response link for table. b. Circuits STL2200 and STL2300 i. 0% ii. 100% iii. See response link for table.	Jessica McHale	10/18/2024	10/23/2024	10/23/2024	Data Request OIS-P-WMP_2024-LU-005_Liberty%20Response_10232024.pdf						
		OES	5	OES-P-WMP_2024-LU-005	1	OES-05-5.1	a. For each circuit listed in Table 1.1 of Liberty's 2025 WMP Update, list whether the circuit is in the HTD Tier 3, Tier 2, or non-HTD. If the circuit spans more than one tier, provide the number of circuit miles in each tier.	a. See response link for table.	Jessica McHale	10/18/2024	10/23/2024	10/23/2024	Data Request OIS-P-WMP_2024-LU-005_Liberty%20Response_10232024.pdf						
		OES	5	OES-P-WMP_2024-LU-005	2	OES-05-5.2	a. What is Liberty's estimated completion date for the Stataline Resiliency Project?	a. The estimated completion date for the Stataline Resiliency Project is November 1, 2026.	Jessica McHale	10/25/2024	10/30/2024	10/30/2024	Data Request OIS-P-WMP_2024-LU-006_Liberty%20Response_10302024.pdf						
		OES	6	OES-P-WMP_2024-LU-006	1	OES-06-6.1	a. Does Liberty plan to mitigate risk on circuits STL2200 and STL2300 in 2025 via interim mitigations such as SRP, additional asset or vegetation management inspections, or traditional hardening? i. If so, please provide details on interim mitigation plans for these circuits.	a. Yes. i. In 2025, Liberty will include both circuits STL2200 and STL2300 in its Vegetation Management Patrol Inspections (WMP-VM-INSP-02). Additionally, circuit STL2200 is included in Liberty's Detailed Asset Inspection (WMP-GDOM-AI-01) schedule for 2022 and circuit STL2300 will be included in Liberty's Patrol Asset Inspections (WMP-GDOM-AI-03) in 2025.	Jessica McHale	10/25/2024	10/30/2024	10/30/2024	Data Request OIS-P-WMP_2024-LU-006_Liberty%20Response_10302024.pdf						
		OES	6	OES-P-WMP_2024-LU-006	2	OES-06-6.2	Energy Safety's data guidelines require electrical corporations to report the actual and projected costs of initiatives in Wildfire Mitigation Data Table 11.1 Liberty's 2024 Q4 Quarterly Data Report (QDR), submitted on February 3, 2025, did not include expenditure actuals for 2024.2 In response to Energy Safety's request, Liberty submitted a revised 2024 Q4 QDR on February 7, 2025, updating Table 11 (column AD) to provide Liberty's reason for the blank 2024 actuals fields, which stated "2024 actual costs are not available yet."3,4 Please provide when Liberty will submit a revised and complete 2024 Q4 QDR with 2024 actuals included.	Liberty will submit a revised 2024 Q4 QDR with its 2024 actual costs included by March 31, 2025.	Jessica McHale	3/5/2025	3/10/2025	3/7/2025	Liberty Response to DR No. OIS-P-WMP-2025-LU-007.pdf						
		OES	7	OES-P-WMP_2025-LU-007	1	OES-07-7.1	Liberty states on p. 140 of its 2023-2025 Redline Redacted WMP, "Using the outputs from Cloudfire, Liberty has identified circuits ordered by the most risk and targeted the circuits with the high risk." For the circuits that have been identified by Liberty's Cloudfire application, please provide an Excel document that lists the top 20 circuits ordered by risk. The spreadsheet should include the following information in separate columns, at a minimum: a) Risk ranking of the circuit segment b) Circuit ID number c) Name of circuit, if applicable d) Number of customers served by the circuit e) Measure taken, or planned to be taken, to reduce the wildfire risk of the circuit If the answer to part (c) above is no, when will Liberty complete the development of the "asset tracking application"? f) How many non-exempt arresters are currently in place across Liberty's service territory? g) Does Liberty have plans to replace all non-exempt arresters currently in place across Liberty's service territory?	Liberty was previously utilizing the risk score outputs from Reax and Arup to quantify its 20 risk circuits. Since Liberty is beginning to use the Dironex Risk Assessment Tool ("DRAT") to identify risk, the requested information has been provided in relationship to the Preliminary Risk Score outputs from DRAT described in Section 8.4 of Liberty's updated 2023-2025 WMP. a) Refer to Section 6 of Liberty's Updated 2023-2025 WMP. b) Refer to Section 6 of Liberty's Updated 2023-2025 WMP. c) Refer to Section 6 of Liberty's Updated 2023-2025 WMP. d) Refer to supporting materials: DR02-Question 1. e) Liberty PPS Risk Model is currently in development. f) Liberty PPS Risk Model is currently in development. g) Liberty PPS Risk Model is currently in development. h) Liberty does not view prioritizing mitigation initiatives as a substitute for calculating tradeoffs between PPS and Wildfire Risk. Liberty's PPS Risk Model is currently in development, so there is not a tradeoff between PPS Risk and Wildfire Risk to evaluate. i) Liberty has not identified disadvantages of calculating PPS and Wildfire Risk tradeoffs. j) Liberty is evaluating its ability to calculate PPS Risk following the implementation of its Asset and Fire Risk tool. Following the integration of Liberty's PPS Risk with its Asset and Fire Risk tool, the integration of Liberty's PPS Risk with its Asset and Fire Risk tool will enhance the Dironex Risk Assessment Tool to quantify risk of additional asset types with SRP being in the initial list of enhancements. Liberty expects to be completed with the additional enhancements by the end of Quarter 3 2025. k) See Response 3a.	Aaron Loue	7/19/2024	7/24/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20CalAdvocates-Liberty-2025WMP-01_Liberty%20Response_07242024.pdf	1					
		CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	1	CalAdv-01-1.1	Liberty states on p. 24 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-02: PPS and Wildfire Risk Tradeoff Transparency, "Liberty does not currently calculate trade-offs between wildfire risk and PPS risk. Liberty prioritizes mitigation initiatives based on wildfire risk and asset failure risk." a) What variables, if any does Liberty utilize to calculate PPS risk? b) Please provide a brief description of Liberty's process and calculations used in calculating PPS risk. c) What variables, if any does Liberty utilize to calculate wildfire risk? d) Please provide a brief description of Liberty's process and calculations used in calculating wildfire risk. e) Does Liberty view prioritizing mitigation initiatives based on wildfire risk and asset failure risk as a substitute for calculating tradeoffs between PPS and Wildfire Risk? Please explain why or why not. f) According to Liberty, what are the disadvantages of calculating PPS and Wildfire Risk tradeoffs? g) Does Liberty intend to be able to calculate PPS and Wildfire Risk Tradeoffs in the future? If yes, when? h) Liberty states on p. 28 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-06: Effectiveness of Sensitive Relay Profile (SRP) and Traditional Hardening: SRP has not been implemented on the system or included in the risk model to allow for calculations on its effectiveness. In selecting SRP for its ignition reduction effectiveness, Liberty relied on data from other utilities that have been using it as a mitigation strategy. a) Please describe or provide a timeline of when Liberty will have the necessary data to show the effectiveness of SRP implementation as a mitigation strategy. b) Please describe or provide a timeline of when Liberty will incorporate SRP into the Dironex Risk Assessment Tool (DRAT).	a) Liberty PPS Risk Model is currently in development. b) Liberty PPS Risk Model is currently in development. c) Refer to Section 6.2 of Liberty's Updated 2023-2025 WMP. d) Refer to Section 6.2 of Liberty's Updated 2023-2025 WMP. e) Liberty does not view prioritizing mitigation initiatives as a substitute for calculating tradeoffs between PPS and Wildfire Risk. Liberty's PPS Risk Model is currently in development, so there is not a tradeoff between PPS Risk and Wildfire Risk to evaluate. f) Liberty has not identified disadvantages of calculating PPS and Wildfire Risk tradeoffs. g) Liberty is evaluating its ability to calculate PPS Risk following the implementation of its Asset and Fire Risk tool. Following the integration of Liberty's PPS Risk with its Asset and Fire Risk tool, the integration of Liberty's PPS Risk with its Asset and Fire Risk tool will enhance the Dironex Risk Assessment Tool to quantify risk of additional asset types with SRP being in the initial list of enhancements. Liberty expects to be completed with the additional enhancements by the end of Quarter 3 2025. k) See Response 3a.	Aaron Loue	7/19/2024	7/24/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20CalAdvocates-Liberty-2025WMP-01_Liberty%20Response_07242024.pdf						
		CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	2	CalAdv-01-1.2	Liberty states on p. 28 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-06: Effectiveness of Sensitive Relay Profile (SRP) and Traditional Hardening: SRP has not been implemented on the system or included in the risk model to allow for calculations on its effectiveness. In selecting SRP for its ignition reduction effectiveness, Liberty relied on data from other utilities that have been using it as a mitigation strategy. a) Please describe or provide a timeline of when Liberty will have the necessary data to show the effectiveness of SRP implementation as a mitigation strategy. b) Please describe or provide a timeline of when Liberty will incorporate SRP into the Dironex Risk Assessment Tool (DRAT).	a) Liberty PPS Risk Model is currently in development. b) Liberty PPS Risk Model is currently in development. c) Refer to Section 6.2 of Liberty's Updated 2023-2025 WMP. d) Refer to Section 6.2 of Liberty's Updated 2023-2025 WMP. e) Liberty does not view prioritizing mitigation initiatives as a substitute for calculating tradeoffs between PPS and Wildfire Risk. Liberty's PPS Risk Model is currently in development, so there is not a tradeoff between PPS Risk and Wildfire Risk to evaluate. f) Liberty has not identified disadvantages of calculating PPS and Wildfire Risk tradeoffs. g) Liberty is evaluating its ability to calculate PPS Risk following the implementation of its Asset and Fire Risk tool. Following the integration of Liberty's PPS Risk with its Asset and Fire Risk tool, the integration of Liberty's PPS Risk with its Asset and Fire Risk tool will enhance the Dironex Risk Assessment Tool to quantify risk of additional asset types with SRP being in the initial list of enhancements. Liberty expects to be completed with the additional enhancements by the end of Quarter 3 2025. k) See Response 3a.	Aaron Loue	7/19/2024	7/24/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20CalAdvocates-Liberty-2025WMP-01_Liberty%20Response_07242024.pdf						
		CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	3	CalAdv-01-1.3	On p. 22-33 of its 2025 WMP Update, Liberty provides its response to Area of Continued Improvement LU-23-09: Covered Conductor Inspections and Maintenance. Please provide the previous version of the Spacer Cable Inspection Checklist found in Appendix A of the WMP Update, prior to the recent updates.	Liberty does not have a previous version.	Aaron Loue	7/19/2024	7/24/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20CalAdvocates-Liberty-2025WMP-01_Liberty%20Response_07242024.pdf						
		CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	4	CalAdv-01-1.4	Liberty forecasts significantly increased 2025 updated expenditures for: • Undergrounding of electric lines and/or equipment (WMP-GDOM-GH-02) • Tree attachment removal (WMP-GDOM-GH-12a) • Detailed inspections of distribution electric lines and equipment (WMP-GDOM-AI-03) • Patrol inspections of distribution electric lines and equipment (WMP-GDOM-AI-03) • Substation inspections (WMP-GDOM-AI-06) • Grid monitoring systems (WMP-SA-02) a) For each of the initiatives listed above, please explain the reasoning behind the 2025 updated expenditure forecast. b) Liberty states on p. 35 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-11: Quality Assurance/Quality Control (QA/QC) sample size and pass rates: "Liberty has established an asset inspection QA/QC target of 90% for 2024 and 2025." a) Please describe the QA/QC audit process for asset inspections. b) Please provide Liberty's internal protocols, procedures, or checklists regarding the QA/QC audit process for asset inspections. c) Will Liberty conduct field audits of each inspector's work to validate the results of an asset inspection? d) If the answer to part (c) above is yes, who will conduct the field audits (e.g., a supervisor, a peer inspector, or a contractor) and when will the field	a) Refer to supporting materials: DR02 - Question 5 b) Refer to supporting materials: DR03 - Question 5 c) Liberty rescored the Rule 20 Tahoe Vista project in 2023. Based on RFPs conducted in 2023, civil contractor costs increased significantly. The original scope also included directional boring, which resulted in higher than expected costs and subsequently was removed from the project scope, resulting in decreased mileage. d) WMP-GDOM-GH-12a actual spend (\$ thousands): 2020 - \$1,598 2021 - \$1,598 2022 - \$1,598 2023 - \$1,598 2024 - \$1,598 2025 - \$1,598 a) Liberty describes its WMP QA/QC process for asset inspections in Section 8.16 of its updated 2023-2025 WMP. b) Refer to supporting materials: DR02 - Question 5b. c) Liberty's QA/QC of detailed inspections is a random sample, so it is not specific to inspectors. d) N/A. e) N/A. f) Liberty plans to implement SRP across all of Liberty's primary distribution conductors during the 2026-2028 WMP cycle. g) The origin of the 10-12 days estimate comes from SFDR rating definition, which is "severe" at 97th percentile or above, i.e. 3% of days of the year. 365 days * 3% = 11 days, which was broadened to 10-12 days.	Aaron Loue	7/19/2024	7/24/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20CalAdvocates-Liberty-2025WMP-01_Liberty%20Response_07242024.pdf	1					
		CalAdvocates	1	CalAdvocates-Liberty-2025WMP-01	5	CalAdv-01-1.5	Liberty states on p. 36-37 of its 2025 WMP Update, in response to Area of Continued Improvement LU-23-15: Reliability Impacts of SRP: Liberty plans to implement SRP on 15 circuits in 2024 and seven circuits in 2025, which will result in 67.45% of Liberty's primary distribution conductor being covered by SRP by the end of 2025. Based on an analysis of historical weather data for the system, Liberty estimates approximately 10-12 days per year when SRP will be enabled. a) How did Liberty determine that the 22 circuits that will have SRP implemented (15 in 2024 and seven in 2025) would result in a 67.45% coverage of Liberty's primary distribution conductors? Please show your calculations or provide worksheets. b) When Liberty implements SRP on the 15 circuits in 2024, what is the total percentage of coverage that Liberty will achieve on the primary distribution conductors? c) When Liberty implements SRP across all of Liberty's primary distribution conductors? d) Does Liberty plan on implementing SRP across all of Liberty's primary distribution conductors? e) If the answer to part (d) above is no, what is the estimated percentage of coverage that Liberty will achieve? f) If the answer to part (d) above is yes, when will Liberty achieve its goal of full coverage across all of Liberty's primary distribution conductors? g) Please provide the historical weather data used by Liberty to estimate that SRP will be enabled approximately 10-12 days per year.	a) Refer to supporting materials: DR02 - Question 8 and 9 b) Refer to supporting materials: DR02 - Question 8 and 9 c) Refer to supporting materials: DR03 - Question 8 and 9 d) Yes. e) N/A. f) Liberty plans to implement SRP across all of Liberty's primary distribution conductors during the 2026-2028 WMP cycle. g) The origin of the 10-12 days estimate comes from SFDR rating definition, which is "severe" at 97th percentile or above, i.e. 3% of days of the year. 365 days * 3% = 11 days, which was broadened to 10-12 days.	Aaron Loue	7/19/2024	7/24/2024	7/24/2024	https://california.libertyutilities.com/uploads/Data%20Requests%20CalAdvocates-Liberty-2025WMP-01_Liberty%20Response_07242024.pdf	1					
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