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October 7, 2026

DATA REQUEST RESPONSE
LIBERTY UTILITIES (LIBERTY)

Data Request No.: OEIS-P-WMP_2026-Liberty-006

Requesting Party: Office of Energy Infrastructure Safety

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Due Date: October 7, 2026

Subject: Q01. Regarding PSPS Notifications
Q02. Regarding Data Disposal

Q01. Regarding PSPS Notifications:

In Table 11-9 on page 320 of Liberty's 2027 Base WMP,¹ Liberty states that PSPS notifications are transmitted in English, with a Spanish line directing customers to additional information "to the extent possible."

- a. Explain what is meant by "to the extent possible" as well as Liberty's process for language selection, delivery verification, and follow-up with regard to PSPS notifications.
- b. Explain how essential warning, timing, service restoration and community resource center information reaches customers who cannot access translated web content.

Response:

- a. Liberty communicates a potential PSPS directly to its customers in two ways:
 1. E-mail. An email to potentially impacted customers. This email also includes the same communication in Spanish. In addition, there are links to documents in 5 other languages (French, Dutch, Chinese, Vietnamese, and Tagalog). These languages were selected to support the diverse customer populations within and around Liberty's service territory and to expand access to critical safety information for customers with limited English proficiency. This email communication is distributed once, at the time Liberty identifies a potential PSPS. Impacted customers will continue to receive updates about the potential PSPS event and/or PSPS event through OnSolve and access to real time updates on Liberty's webpage.
 2. OnSolve. OnSolve communications to impacted customers. Through the OnSolve platform, impacted customers will receive a phone call, email, and/or text message regarding the potential PSPS. This method of communication is used throughout the possible PSPS event. "To the extent possible" recognizes that certain communication channels, particularly SMS/text messages delivered through the OnSolve platform, are subject to character limitations and other technical constraints that may limit the amount of translated content that can be included within the message itself. Consistent with these limitations, Liberty strives to provide translated information through all available communication channels and directs customers to additional translated resources whenever full translations cannot be embedded in the notification.
- b. As stated above, all impacted customers receive an email in English and Spanish and links to the message in five (5) other languages. In addition, the PSPS Updates webpage link is included in all customer updates. There, customers can also view a

¹ Liberty 2027 Base WMP R0, published Aug. 31, 2026, URL:
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=61181&docket=WMP-LU&shareable=true>).

Spanish translation of the content on the webpage. Lastly, Liberty engages with CBOs. Prior to a potential PSPS event, the AFN Coordinator will engage with CBOs that serve the impacted area through various means, including email, phone calls, text messages, and WhatsApp messaging with the goal of working with the CBOs to reach as many impacted customers as possible, and in particular, those who may not be able to access translated web content.

Q02. Regarding Data Disposal:

On page 343 of Liberty's 2027 Base WMP, Liberty states that its formal data disposal policy will not be created until the ten-year mark of its retained inspection data is reached.

- a. Provide a plan outlining how Liberty intends to protect, isolate, and secure undisposed data once its mandated retention periods have concluded. For example, how Liberty is going to address the access controls, encryption standards, and monitoring protocols applied to this post-retention data while it awaits formal disposal.
- b. Explain why waiting until the end of the ten-year mark to create a formal disposal policy would not cause cybersecurity risks.

Response:

- a. Liberty will protect and secure any undisposed data in its SQL Server database in an isolated archive. This archive will have the same access controls, encryption standards, and monitoring protocols as current data which has not yet reached its retention period. The SQL server resides in a Liberty controlled data center. Liberty has a mature cybersecurity practice which is regularly tested and which provides ongoing data confidentiality, integrity, and accessibility with properly layered cybersecurity controls.
- b. Waiting until Liberty reaches the ten-year retention milestone to finalize a formal disposal policy does not create a cybersecurity risk because the data remains protected throughout its lifecycle under Liberty's established cybersecurity and information governance controls. The risk associated with data retention is not driven by the existence of a disposal policy itself, but by whether the retained information is adequately secured. Liberty's archived inspection data will remain subject to the same access controls, encryption, monitoring, and administrative safeguards that protect active records. All retained records continue to be maintained pursuant to applicable regulatory retention requirements.