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DATA REQUEST RESPONSE
LIBERTY UTILITIES (LIBERTY)

Data Request No.:	OEIS-P-WMP_2026-Liberty-010
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Date Received:	October 27, 2026
Due Date:	October 30, 2026
Subject:	Q01. PSPS Decision Making Q02. Regarding Asset Reinforcements in High Wind Areas

Q01. Regarding PSPS Decision Making:
The California Public Utilities Commission (CPUC) Safety and Enforcement Division (SED)'s Incident Investigation Report on the 2020 Mountain View Fire (published July 2026)[1] states on page 13, "Without the [Energy Release Component] ERC exceeding the 92nd percentile, Liberty's PSPS plan disregarded any other conditions present to initiate a PSPS event [on the Topaz Circuit]. There were no Red Flag warnings issued on November 17, 2020." On page 32 of its 2027 Base WMP,[2] Liberty states that its lessons learned from the Mountain View Fire were that it, "Developed new PSPS screening criteria to account for late season weather conditions that occurred on the day of the fire."

a. Provide a brief narrative of how Liberty has modified its PSPS decision tree after this event, including what other conditions are now considered in addition to the ERC (such as the Composite Risk Index).
b. Provide a brief narrative on how Liberty's current PSPS decision tree formulation captures low-likelihood/high-consequence events (sometimes referred to as "black swan" events).

Q01 Response:

a. As set forth in Liberty's 2020 Wildfire Mitigation Plan ("WMP"), the three criteria for Liberty's Public Safety Power Shutoff ("PSPS") decision-making at the time of the 2020 Mountain View Fire were Energy Release Component ("ERC") percentile, wind gusts, and Fosberg Fire Weather Index ("FFWI"). After 2020, Liberty developed the Composite Risk Index ("CRI") as its primary screening criterion for PSPS decision-making to account for the potential for weather conditions to vary significantly on a given day such as occurred on the day of the Mountain View Fire.

   As described in Section 10.6.1 of Liberty's 2027 WMP, the CRI is a screening criterion that combines a function of wind gust (as proxy for utility fire ignition likelihood) and flame length (as proxy for fire consequence) into a single forecastable composite index.

   As the Percent of CRI Threshold increases above 80%, Liberty will monitor potential PSPS conditions. If CRI reaches 100%, additional analysis will be done to determine the need for PSPS. Additional information regarding CRI is provided in Section 10.6.1 of Liberty's 2027 WMP.

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1 CPUC SED Incident Investigation Report, published July 24, 2026, URL: (https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/esrb/aeo/liberty-mountain-view-fire/appendix-c-public--e2020111701-mountain-view-fire-sed-incident-investigation-report-final.pdf).

2 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).

Section 7 of Liberty's WMP describes weather conditions monitored to determine the need to initiate PSPS. These conditions include National Fire Danger Rating System indices, National Weather Service products, Fire Potential Indices, and other weather indicators, such as:

- Fuel moisture;
- Relative humidity;
- Wind gust;
- High Wind Warning;
- Red Flag Warning;
- Energy Release Component;
- Fosberg Fire Weather Index;
- Severe Fire Danger Index; and
- Composite Risk Index

For additional discussion of Liberty's current PSPS framework, please refer to Sections 7, 10.6.1, and 10.6.2 of Liberty's 2027 WMP.

b. Liberty's current PSPS decision-making framework is specifically designed to account for scenarios in which the probability of a utility-caused ignition may be relatively low, but the potential consequences of such an ignition are high. As described in WMP Section 10.6.1, the CRI combines both ignition likelihood and fire consequence into a single forecastable composite index.

Low-likelihood, high-consequence events, sometimes referred to as "black swan" events, can be difficult to capture in wildfire planning models because climatologically unprecedented wind events are, by definition, absent from the historical weather records commonly used to drive fire simulations and related analyses. The CRI is used as an operational forecasting and decision-support tool. Because CRI is driven by forecast weather conditions rather than historical climatology, a forecasted extreme wind event, even if unprecedented in the historical record, will be reflected in the CRI calculations. In this way, Liberty's current PSPS framework is equipped to identify and respond to low-likelihood, high-consequence wildfire scenarios. For additional discussion, refer to Sections 10.6.1 and 10.6.2 of Liberty's 2027 WMP.

Q02. Regarding Asset Reinforcements in High Wind Areas:
The CPUC SED Incident Investigation Report on the 2020 Mountain View Fire states on page 16, "Liberty failed to provide evidence that it utilized any additional construction practices to reinforce its system based on these known high wind conditions. In addition, Liberty does not have procedures for the use of line spacers in distribution circuits."

a. Provide a brief narrative of what reinforcing construction practices Liberty has implemented on circuits in high wind areas, such as the Topaz circuit, since the Mountain View Fire.
b. Provide a brief narrative of steps Liberty has taken to identify and remediate existing circuits and assets that may require reinforcement in high wind areas, such as the Topaz circuit, since the Mountain View Fire.
c. Does Liberty have procedures in place for implementing line spacers in distribution circuits?
    i. If not, explain why.

Q02 Response:

Liberty notes that it is challenging SED's alleged violations related to the Mountain View Fire and does not agree with the cited assertion in the SED investigation report. As described further below, Liberty developed and was implementing before the Mountain View Fire a comprehensive rebuild project for the Topaz circuit that included both traditional hardening and covered conductor.

a. Reinforcing construction practices on high-wind circuits
In addition to utilizing PSPS to mitigate wildfire risk during high-wind events, Liberty designs and builds its overhead distribution facilities to meet or exceed GO 95 Heavy Loading requirements. Where Liberty's design criteria are more stringent than GO 95 Heavy Loading requirements, Liberty's criteria govern.

Liberty uses the following construction measures to maintain conductor separation in high wind areas and reduce wind-related risk:

1. **Covered conductor.** Liberty deploys covered conductor primarily in High Fire Threat Districts ("HFTD"). Covered conductor reduces the risk of ignition from conductor-to-conductor contact or wire down incidents.
2. **Traditional overhead hardening.** Where conditions warrant, Liberty replaces aging infrastructure and implements traditional overhead hardening methods. This work may include stronger poles, wider crossarms with increased pin spacing, modern conductor, and shorter spans. GO 95, Table 2, Footnote (zz) recognizes increased pin spacing as a measure for high-wind areas.

3. **Spacers.** Spacers may be installed at the discretion of qualified field personnel.

For additional discussion of Liberty's grid hardening activities, please refer to Section 8 of Liberty's 2027 WMP.

b. Identifying circuits and assets for reinforcement

Liberty developed and was executing on a system hardening project for the Topaz circuit before the Mountain View Fire, as described in Liberty's 2019 and 2020 WMPs. Liberty assessed the circuit in light of the severe wind and weather conditions of the Antelope Valley, as well as the circuit's outage history. Liberty sought approval for the Topaz Line Rebuild Project in its 2019 General Rate Case (GRC). The Commission approved it as a multi-year, multi-phase hardening project.

Since the Mountain View Fire, Liberty has continued to evaluate and execute projects that harden circuits in identified high-wind areas. Liberty uses its wildfire risk model and benefit-cost analysis to identify and prioritize circuits for grid hardening, as described in Section 5 and 6 of Liberty's 2027 WMP. That model accounts for wind in two ways:

1. **Outage likelihood.** Liberty's risk model estimates the likelihood of an outage on each circuit by considering weather, asset characteristics, vegetation, load, and inspection data. Wind gust is a key predictor in the model. Higher wind gusts generally increase the predicted likelihood of an outage.

2. **Extreme fire weather.** Liberty's definition of extreme fire weather includes dry atmospheric conditions occurring together with high wind gusts. Liberty treats outages that occur under these conditions as the outages capable of starting a subsequent wildfire.

As a result, exposure to high winds increases a circuit's risk score, which is reflected in its priority for mitigation. Liberty uses the model results, together with engineering, operational, and strategic reviews, to select and sequence grid hardening projects. Mitigation measures include overhead hardening with covered conductor, overhead hardening without covered conductor, and pole replacements; all three of which may include wider crossarms, increased pin spacing, and shorter spans. Further, tree attachment removals, undergrounding, and other mitigations are considered.

Liberty maintains its overhead facilities through asset inspection programs conducted in accordance with GO 165. Inspections assess pole, crossarm, hardware, and conductor conditions. Identified conditions enter Liberty's corrective work process for prioritization and remediation. Through this process, Liberty identifies and remediates existing asset conditions on its overhead lines, including lines in high-wind areas.

For additional discussion of Liberty's risk methodology, mitigation prioritization, grid hardening, and inspection activities, please refer to Sections 5, 6, and 8 and Appendix B of Liberty's 2027 WMP.

c. Procedures for line spacers on distribution circuits

Liberty typically utilizes increased pin spacing, covered conductor, and shorter spans to maintain conductor separation. Liberty does not have a standalone written procedure for installing line spacers on distribution circuits. Qualified field personnel may install spacers where they determine spacers may provide incremental value.

Liberty continually evaluates new technologies and practices to improve the safety and reliability of its system. As part of this effort, Liberty will continue to evaluate spacer applications for potential inclusion in its design and construction standards.