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July 7, 2025

DATA REQUEST RESPONSE

LIBERTY UTILITIES (LIBERTY)

Data Request No.:	OEIS-P-WMP_2025-Liberty-001
Requesting Party:	Office of Energy Infrastructure Safety
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Date Received:	July 1, 2025
Due Date:	July 7, 2025
Subject:	Q01. Regarding Vegetation Management Inspection Targets Q02. Regarding Vegetation Management Procedures Q03. Regarding Liberty's Pole Clearing Target (WMP-VM-VFM-01) Q04. Regarding Liberty's Wood and Slash Management Target (WMP-VM-VFM-02) Q05. Regarding Extreme-Event Scenarios Q06. Regarding Top-Risk Circuits Q07. Regarding Risk Reduction for Top Circuits

Q01. Regarding Vegetation Management Inspection Targets:

In Table 4-1 of its 2026-2028 WMP, Liberty reports 1,476.9 circuit miles of overhead distribution lines and 32.89 circuit miles of transmission lines, totaling 1,509.79 combined circuit miles of distribution and transmission overhead lines. In Table 9-2, Liberty provides a three-year total of 660 circuit miles for its "Vegetation Management Inspection Program – Detailed" and reports a cumulative quarterly target for 2026 Q4 of 700 circuit miles for its "Vegetation Management Program – LiDAR."

In Table 9-3 of its 2026-2028 WMP, for "Vegetation Management Program – Detailed" Liberty lists the "Inspection Type" as "Transmission and Distribution," "Area Inspected" as "Territory," and "Frequency" as "Three-year cycle." In the same table, for "Vegetation Management Program – LiDAR" Liberty lists the "Inspection Type" as "Transmission and Distribution," "Area Inspected" as "Territory," and "Frequency" as "Annual."

a. Does the "Three Year Total" target for "Vegetation Management Program – Detailed" include all overhead circuit miles in Liberty's territory?
    i. If yes, explain the different number of circuit miles reported in Table 4-1 and the "Three Year Total" target for "Vegetation Management Program – Detailed."
    ii. If not, explain why the targets do not cover all overhead distribution circuit miles in Liberty's territory during the three-year cycle.
b. Does the "Cumulative Quarterly Target, 2026 Q4" for "Vegetation Management Program – LiDAR" include all overhead circuit miles in Liberty's territory?
    i. If yes, explain the different number of circuit miles reported in Table 4-1 and the "Cumulative Quarterly Target, 2026 Q4" target for "Vegetation Management Program – LiDAR."
    ii. If not, explain the criteria for including and excluding overhead circuit miles from the annual LiDAR program.

Response 01:

a. The target unit for detailed inspections is miles inspected of overhead primary distribution and transmission voltage classes (12kV-25kV, and 60kV-120kV). The target does not include the secondary voltage class distribution lines that are included in Table 4-1. The total miles of overhead primary distribution and transmission circuits is approximately 700 miles. Liberty intends to complete detailed inspections on one third of its overhead primary distribution and transmission system per year. Liberty also inspects secondary lines along its primary distribution system. These secondary line inspections are not included in the target.
b. The target unit for LiDAR inspections is miles inspected of overhead primary distribution and transmission voltage classes (12kV-25kV, and 60kV-120kV). The target does not include the secondary voltage class distribution lines that are included in Table 4-1. The

total miles of overhead primary distribution and transmission circuits is approximately 700 miles. Liberty intends to complete LiDAR inspections of the total overhead primary distribution and transmission system annually.

Q02. Regarding Vegetation Management Procedures:

a. Provide the most recent versions of the following procedures documents:

i. Vegetation Management Plan (VM-02)

ii. Hazard Tree Management Plan (VM-03)

iii. Post Work Verification Procedure (VM-04)

iv. Vegetation Threat Procedure (VM-05)

v. Vegetation Management Notification and Refusal Resolution Policy (VM-06)

vi. Vegetation Management Inspection Manual (VM-07)

vii. Fire Prevention Plan

Response 02:

a. Refer to attachments "Liberty Response_DR-001-Q02i-vi" and "Liberty Response_DR-001-Q02vii."

Q03. Regarding Liberty's Pole Clearing Target (WMP-VM-VFM-01):

a. On page 170 of its 2026-2028 WMP, Liberty sets annual targets in 2026, 2027, and 2028 of 4,900 poles. On page 182 of its 2026-2028 WMP, Liberty states "[t]here are approximately 4,900 poles that require clearing on an annual basis in SRA and FRA." Of the 4,900 poles targeted for pole clearing, specify how many of those poles:
   i. Are required to be cleared under Public Resources Code (PRC) 4292 (i.e., poles in the SRA).
   ii. Are not required to be cleared under PRC 4292 (i.e., poles not in the SRA).

b. For any poles not subject to PRC 4292, identify the applicable governing standards and/or Liberty's standard operating procedures that require those poles to be cleared.

c. On page 170 of its 2026-2028 WMP, Liberty sets annual targets in 2026, 2027, and 2028 of 4,900 poles. On page 209 of its 2023-2025 Base WMP, Liberty set annual targets in 2023, 2024, and 2025 of 4,960 poles. Provide justification and details of planned or completed activities which support that the volume of pole clearing work required during Liberty's 2026-2028 WMP cycle will decrease by 60 poles.

Response 03:

a.
   i. Of the approximately 4,900 poles targeted for pole clearing, approximately 4,500 are required to be cleared under Public Resources Code (PRC) 4292.
   ii. Of the approximately 4,900 poles targeted for pole clearing, approximately 450 are not required to be cleared under Public Resources Code (PRC) 4292.

b. The applicable standard that requires Liberty to clear those poles not subject to PRC 4292 is outlined in the Liberty 2026-2028 Wildfire Mitigation Plan, Section 9.4.1.

c. Liberty updated its annual pole clearing target to 4,900 to account for fluctuations in poles from ongoing pole replacement work and system upgrades.

Q04. Regarding Liberty's Wood and Slash Management Target (WMP-VM-VFM-02): On page 280 of its 2026–2028 Base WMP, Liberty sets annual wood and slash management targets of 280 acres for each year: 2026, 2027, and 2028. On page 183, Liberty states, "Liberty has implemented a Fuel Management Program as a precautionary measure, where feasible, to reduce wildfire risks by removing wood and treating brush and slash after vegetation maintenance is performed. Additional treatments that reduce surface fuels from previous activities and those that further reduce fuel loads are also implemented."

a. Provide an outline that describes how Liberty plans to complete vegetation management work to meet its 280-acre annual wood and slash management target. The outline must include:
   i. The number of acres that will receive wood and slash management treatments only in areas where material was generated by Liberty's own vegetation management activities.
      1. Specify the diameter classes of woody vegetation to be treated under these activities and describe how each diameter class will be treated.
   ii. The number of acres that Liberty will perform additional fuel management work on and treat material that was not generated by Liberty's own vegetation management activities.
      1. Specify the diameter classes of woody vegetation to be treated under these activities and describe how each diameter class will be treated.

Response 04:

a.
   i. Wood and slash management is a component of tree removal work and is dependent upon trees identified in the field during ground-based inspections requiring mitigation, and landowner preference for wood removal. Liberty calculates acres treated based off completed work orders with cleanup methods of

100% removal or cutting wood rounds into firewood lengths. Typically, if work occurs on a residential lot less than 0.25 acres the entire lot size is counted. For larger parcels where wood and slash management work occurs, Liberty calculates the acres treated based on the length of the right-of-way for the span. In instances where wood and slash is treated on more than one tree at a location, Liberty counts the acres for that location only once. Liberty has averaged about 3,350 tree removals per year since 2023 with 51% involving wood management post tree work. To determine its annual target, Liberty forecasts approximate acres treated based off historical numbers.

1. Diameter classes of woody vegetation treated are as follows:
    - R1: 4.0” < 12” DBH
    - R2: 12.0” < 24” DBH
    - R3: 24” < 36” DBH
    - R4: 36” < 48” DBH
    - R5: 48” DBH and greater

ii. Liberty is unable to forecast the number of acres treated for projects where vegetation material is not generated through its own vegetation management activities. However, Liberty actively develops and manages additional fuel management projects through defined scopes of work and detailed specifications. These projects are implemented in coordination with agency partners and landowners, with acreage calculated based on the specific project footprint. Liberty primarily takes an opportunistic approach, collaborating with local stakeholders to support or contribute to fuel reduction efforts that align with its operational priorities. Liberty will also continue to support the U.S. Forest Service’s Forest Resiliency Corridors projects located adjacent to Liberty’s infrastructure.

1. Diameter classes of woody vegetation treated are as follows:
    - BR: < 4.0” DBH
    - R1: 4.0” < 12” DBH
    - R2: 12.0” < 24” DBH
    - R3: 24” < 36” DBH
    - R4: 36” < 48” DBH
    - R5: 48” DBH and greater

Q05. Regarding Extreme-Event Scenarios:

a. On page 61 of Liberty’s 2026-2028 WMP, Liberty states that it is “assessing the ability of FireSight to account for extreme or high uncertainty scenarios.” Provide the timeline, including milestones and associated dates, for when Liberty intends to complete this assessment and integrate any extreme scenarios into its risk modeling.

b. On page 62 of Liberty's 2026-2028 Base WMP, in Table 5-4 Liberty Summary of Extreme-Event Scenarios, Liberty includes the "Impact of climate change on long-term weather and vegetation conditions that impact fire behavior." Provide the timeframe for climate change being evaluated (e.g., 30-year forecast).

Response 05:

a. Currently, Liberty does not have a timeline of when it intends to complete the assessment and integrate the extreme scenarios into its risk model. The assessment of extreme or high uncertainty scenarios is solely dependent on Technosylva's prioritization of such modeling efforts and because these types of scenarios are difficult to model, Liberty does not have timeline
b. Currently, Liberty does not plan to evaluate climate change in its risk modeling framework.

Q06. Regarding Top-Risk Circuits:

On pages 71-72 of its 2026-2028 WMP, Liberty discusses and provides its top risk-contributing circuits, shown in Table 5-6 Liberty Top-Risk Circuits.

a. Provide the total overall utility risk score used to calculate whether a circuit qualified as at least 1% of the total overall utility risk score represented within the table, as described on page 71.

b. Provide the total number of circuits evaluated within Liberty's service territory.

Response 06:

a. 0.02659407
b. 60

Q07. Regarding Risk Reduction for Top Circuits:

a. Provide an updated version of Table 6-5 Summary of Risk Reduction for Top Circuits (Liberty's 2026-2028 WMP, pages 103-104) via Excel with the following additional columns:

i. 2026 Grid Hardening Planned (circuit mileage)

ii. 2027 Grid Hardening Planned (circuit mileage)

iii. 2028 Grid Hardening Planned (circuit mileage)

iv. 2026 Covered Conductor Planned (circuit mileage)

v. 2027 Covered Conductor Planned (circuit mileage)

vi. 2028 Covered Conductor Planned (circuit mileage)

b. Identify whether "grid hardening" includes covered conductor for the circuit

mileages provided.

Response 07:

a. Refer to attachment: “Liberty Response_DR-001-Q07”
b. Grid hardening refers to all WMP initiative activities included in Section 8.2 of Liberty's 2026-2028 Base WMP and includes covered conductor. Because grid hardening refers to all WMP initiative activities included in Section 8.2, overall grid hardening is not measured in circuit mileage (*e.g.,* example targets include the number of tree attachment removals, the number of fuse replacements).