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DATA REQUEST RESPONSE
LIBERTY UTILITIES (LIBERTY)

Data Request No.: OEIS-P-WMP_2025-Liberty-007

Requesting Party: Office of Energy Infrastructure Safety

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Subject(s):

- Q01. Regarding Definition of “Significant” Events
- Q02. Regarding Corporate Emergency Management Plan
- Q03. Regarding Liberty’s Service Restoration Process
- Q04. Regarding Liberty’s PSPS Playbook
- Q05. Regarding the “Work Type” Column Header in Tables 9-24 through 9-28 and Table 9-32
- Q06. Regarding Inconsistent Percentages of Employees with Vegetation Management
Credentials or Certifications
- Q07. Regarding Liberty’s Wood and Slash Management Program

Q01. Regarding Definition of “Significant” Events:

- a. On pages 256-257 of its 2026-2028 Base WMP, Liberty refers to actions being taken during or after “significant events” or involving a “significant number of customers,” but the term “significant” is not defined.
 - i. Define “significant events” as used in this context.
 - ii. Define “significant number of customers” as used in this context.

Response:

- a.
 - i. On page 257 of Liberty’s 2026-2028 Base WMP, Liberty states: “City and county officials, OES offices, critical infrastructure, CPUC, and agency partners will receive the earliest notifications of a “significant” planned or potentially planned outage, up to eight days in advance, when possible.” In this context, significant is not defined by specific thresholds. Liberty’s customer team determines if an outage requires communication with city and county officials and agency partners, based on factors including the number of customers impacted, outage duration, and potential customer support needs (*e.g.*, warming centers during winter storms).
 - ii. On page 256 of Liberty’s 2026-2028 Base WMP, Liberty states: “During a major outage or emergency that affects a significant number of customers, an email is sent to personnel, agencies, and media to provide information, detail, and status of the outage.” In this context, significant is not defined by specific thresholds. Liberty’s communications and customer teams determine if an outage or emergency requires communication to agency partners and the media, based on factors including outage duration, potential customer support needs, and regulatory requirements (*e.g.* Public Safety Power Shutoff events).

Q02. Regarding Corporate Emergency Management Plan:

- a. On page 245 of its 2026-2028 Base WMP, Liberty refers to a “Corporate Emergency Management Plan.” Provide a copy of Liberty’s Corporate Emergency Management Plan.

Response:

Refer to attachment “Liberty Response_DR-007-Q02.pdf”

Q03. Regarding Liberty's Service Restoration Process:

- a. On page 255 of its 2026-2028 Base WMP, Liberty states that its "plan to restore customers during emergencies is described in Section 11.2.1." Upon review, this section does not include such detail. Provide a detailed description of Liberty's plan to restore customers' power during emergencies.

Response:

The purpose of the Liberty restoration plan is to minimize the risks inherent in a long service interruption to a variety of customer types, including medical baseline customers. Service restoration is considered a priority throughout Liberty's entire service territory. Service restoration is unique for each emergency event and restoration prioritization is influenced by multiple factors that include safety, accessibility, availability of repair parts, availability of personnel, etc. The Liberty CEMP identifies general restoration prioritization guidelines, but allows for the Incident Commander, or designee, to alter priorities according to the circumstances of the emergency and in coordination with essential load customer and government agencies. Refer to attachment "Liberty Response_DR-007-Q02.pdf."

Protocols, policies, and procedures:

- Damage Assessment: The designated Incident Commander is responsible for determining how damage assessment will be best achieved for the specific emergency. The Incident Commander may delegate the responsibility, or a portion of the responsibility, to the manager(s) or other qualified individual(s) or retain this responsibility. Detailed procedures are provided in the Liberty CEMP pages 18-19, paragraph 6 subparagraphs a through g.
- Service restoration: All critical infrastructure in the Liberty Service Territory is prioritized for restoration in our mapping system. In general, restoration will proceed in this order:
 - i. Radial transmission and substations.
 - ii. Distribution circuits with essential customers, such as health care facilities,
 - iii. utilities, public safety, governmental facilities, and lifeline customers.
 - iv. Circuits with the greatest number of customers.
 - v. Primary taps, followed by secondary lines.
 - vi. Individual services that are accessible and serviceable can be addressed

Below is the priority list of Liberty's essential customers. Priority assumes circuits, equipment, and services are accessible and repairable.

- Health Care Facilities
 - i. Primary care hospitals
- Utility Services/Districts

- i. Public utility districts
 - ii. Telecommunications
 - iii. Water and water treatment facilities
 - iv. Pipeline
- Public Safety Agencies
 - i. Public safety dispatch centers
 - ii. Law enforcement facilities/holding facilities
 - iii. Fire operations facilities
 - iv. Transportation equipment and facilities
- Government facilities
 - i. Green Cross and Lifeline customers

Below is an operational flow diagram for Liberty's service restoration process:



Q04. Regarding Liberty's PSPS Playbook:

- a. On page 250 of its 2026-2028 Base WMP, Liberty references a "PSPS Playbook" as part of its emergency preparedness process. Provide a copy of Liberty's PSPS Playbook.

Response:

Refer to attachment "Liberty Response_DR-007-Q04."

Q05. Regarding the “Work Type” Column Header in Tables 9-24 through 9-28 and Table 9-32:

On pages 204 through 205 of its 2026-2028 Base WMP, Liberty includes Table 9-24, which lists quality control pass rate sample units, and Tables 9-25 through 9-28, which list quality control “Pass / Fail” criteria. On page 211 of its 2026-2028 Base WMP, Liberty includes Table 9-32, which lists the number of internal vegetation management employees with credentials or certifications. All six tables include a “Work Type” column header, but “Work Type” is not applicable to all items in Tables 9-25 through 9-28 and Table 9-32.

- a. Please provide Tables 9-25 through 9-28 and Table 9-32 with a more suitable and descriptive column header than “Work Type.”

Response:

Updated Table 9-25: Completed Tree Work Criteria

| Completed Tree Work – Conditions Evaluated | Category |
|---|-----------------|
| Work Performed as Prescribed | Pass / Fail |
| Maintenance Clearance Distance Achieved | Pass / Fail |
| Will Hold Until Next Inspection | Pass / Fail |
| Potential Hazard Remains | Pass / Fail |
| Site Clean | Pass / Fail |
| ANSI Pruning Applied | Pass / Fail |
| Other Trees Affected | Pass / Fail |
| Site Conditions Stable | Pass / Fail |

Updated Table 9-26: VM Detailed Inspections Criteria

| VM Detailed Inspections – Conditions Evaluated | Category |
|---|-----------------|
| Location Information Correct | Pass / Fail |
| Species Correct | Pass / Fail |
| Quantity Correct | Pass / Fail |
| Work Type Noted | Pass / Fail |
| Tree Health Noted | Pass / Fail |
| Priority Noted | Pass / Fail |
| Project Type Note | Pass / Fail |
| Clean Up Method Noted | Pass / Fail |
| Quantity of Non-Listed Trees | Pass / Fail |

Updated Table 9-27: Hazard Tree Work Criteria

| Hazard Tree Work – Conditions Evaluated | Category |
|--|-----------------|
| Work Performed as Prescribed | Pass / Fail |
| Potential Hazard Remains | Pass / Fail |
| Site Clean | Pass / Fail |
| Other Trees Affected | Pass / Fail |
| Site Condition Stable | Pass / Fail |

Updated Table 9-28: Pole Clearing Criteria

| Pole Clearing – Conditions Evaluated | Category |
|---|-----------------|
| Location Information Correct | Pass / Fail |
| Subject Pole | Pass / Fail |
| Pole Clearing Tag | Pass / Fail |
| PRC 4292 Radial Clearance | Pass / Fail |
| PRC 4292 Vertical Clearance 0-8ft | Pass / Fail |
| PRC 4292 Vertical Clearance >8ft | Pass / Fail |
| ANSI Pruning Applied | Pass / Fail |
| Site Clean | Pass / Fail |

See response to Q06 for updated Table 9-32.

Q06. Regarding Inconsistent Percentages of Employees with Vegetation Management Credentials or Certifications:

On page 211 of its 2026-2028 Base WMP, Liberty indicates in “Table 9-32: Liberty VM Credentials or Certifications” that 100% of its “Internal VM Full-Time Employees” are ISA Certified Arborists. In the “Number” column of Table 9-32, Liberty indicates that it has 6 ISA Certified Arborists. This suggests Liberty has 6 Internal VM Full-Time Employees (i.e., $6/6 * 100 = 100\%$). However, all other values in the “Number” column of Table 9-32 require a denominator of 7 to achieve their associated percentage in the “Percentage” column (e.g., $1/7 * 100 = 14\%$, $5/7 * 100 = 71\%$, and $6/7 * 100 = 85\%$).

- a. Provide the total number of Liberty internal full-time vegetation management employees.

Response:

Liberty has seven internal full-time employees in vegetation management.

Updated Table 9-32: Liberty VM Credentials or Certifications

| Credential or Certification Type | Liberty Internal VM Full-Time Employees with Credentials | |
|--|--|------------|
| | Number | Percentage |
| ISA Certified Arborist | 6 | 86% |
| ISA Tree Risk Assessment Qualification | 5 | 71% |
| ISA Utility Specialist | 6 | 86% |
| ISA Board Certified Master Arborist | 1 | 14% |
| ISA Prescription Pruning Qualification | 1 | 14% |
| Certified Tree Safety Professional | 1 | 14% |
| Utility Vegetation Management Professional Certificate | 1 | 14% |
| PMI Project Management Professional | 1 | 14% |

Q07. Regarding Liberty’s Wood and Slash Management Program:

In response to Question 04 of Data Request OEIS-P-WMP_2025-Liberty-001, Liberty states, “Liberty has averaged about 3,350 tree removals per year since 2023 with 51% involving wood management post tree work.” Additionally, on page 184 of its 2026-2028 Base WMP, Liberty states, “All limbs, brush and debris located within 100 feet of equipment accessible roads shall be chipped and broadcasted or chipped and hauled off-site. When brush and limbs cannot be chipped and broadcasted or chipped and hauled off-site, the clean-up method may be lop-and-scatter or otherwise specified.”

- a. Provide the percentage of wood and slash management work, since 2023, that was completed using the following methods:
 - i. Chip and broadcast
 - ii. Chip and haul off-site
 - iii. Lop-and-scatter

Response:

- a.
 - i. Chip and broadcast – 3.71%
 - ii. Chip and haul off-site – 71.44%
 - iii. Lop-and-scatter – 10.3%