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|-----------------|---|------------------------|
| Docket | : | <u>A.25-06-017</u> |
| Exhibit Number | : | <u>CA-07-S</u> |
| Commissioner | : | <u>Matthew Baker</u> |
| Admin Law Judge | : | <u>Robert Haga</u> |
| Witness | : | <u>Charles Madison</u> |



**PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**Supplemental Testimony
on
Operations for Mountain View Fire
Cost-Recovery Application**

Reasonableness of Operations Prior to Ignition

PUBLIC

San Francisco, California
January 13, 2026

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REASONABLENESS OF OPERATIONS

I. INTRODUCTION

This exhibit pertains to the application of Liberty Utilities (CalPeco Electric) LLC, (“Liberty”) to recover costs associated with the Mountain View Fire (Application 25-06-017).

This exhibit presents the analyses by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) of the amended responses to data requests provided by Liberty on December 9, 2025 and December 10, 2025.

II. SIGNIFICANCE OF LIBERTY DATA REQUEST AMENDMENTS AND RELATED CLARIFICATIONS ON INSPECTION, REPAIR, AND IGNITION HISTORY

12 Liberty submitted amended responses to multiple data requests on December 9,
13 2025 and December 10, 2025. The amended responses provide additional information
14 that supplements Liberty's initial data request responses as reflected in Table 1. The
15 amended response to CalAdvocates-LIB-A2506017-001, question 1, concerns the
16 structure, completeness, and interpretation of Liberty's 2020 asset survey data relied upon
17 in Cal Advocates CA-07 - Testimony on Operations for Mountain View Fire Cost-
18 Recovery Application.¹

¹ Liberty response (original) to data request CalAdvocates-LIB-A2506017-001, question 1, tab in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025.

Table 1 – Amended Data Requests Submitted from December 3 – 10, 2025

| Data Request | Subject(s) | Question Number(s) | Original Date Submitted | Date Amended |
|-------------------------------|---|--------------------|-------------------------|--------------|
| CalAdvocates-LIB-A2506017-001 | Asset Work Orders; Wire Down Events; Ignition History | 1, 2, 7-12 | 9/11/25 | 12/9/25 |
| CalAdvocates-LIB-A2506017-002 | Standards for Patrol Inspections | 1, 2 | 9/10/25 | 12/9/25 |
| CalAdvocates-LIB-A2506017-004 | Asset Inspection Records | 2 | 9/11/25 | 12/10/25 |
| CalAdvocates-LIB-A2506017-016 | 2020 Asset Survey Results | All | 10/6/25 ² | 12/9/25 |
| CalAdvocates-LIB-A2506017-031 | NV Energy Records Review; Intrusive Pole Inspection; Corrective Work Status | 1, 5 | 10/31/25 | 12/9/25 |

2 Table 1 contains a list of the topics addressed in the amended responses, such as
3 corrective action tracking practices or inspection history on the Topaz 1261 circuit. The
4 amendment to CalAdvocates-LIB-A2506017-001, question 1 affects the dataset used to
5 assess inspection results, condition codes, and corrective actions across the Topaz 1261
6 circuit.^{3,4} Accordingly, this supplemental testimony focuses primarily on the implications
7 of the amended CalAdvocates-LIB-A2506017-001, question 1 on inspections. This
8 supplemental testimony also addresses a 2014 ignition on the Topaz circuit which Liberty
9 had not previously identified, while also situating it within the broader context of
10 Liberty's amended disclosures.⁵

A. Amended 2020 Asset Survey Inspection Data.

12 The amended CalAdvocates-LIB-A2506017-001, question 1 data (amended
13 dataset) differs in structure and completeness from the original data provided by Liberty

² CalAdvocates-LIB-A2506017 – 016 was amended twice. The first amended response was received on October 24, 2025.

³ Table 1 data is from internal tracking records.

⁴ Liberty response (amended) to data request CalAdvocates-LIB-A2506017-001, question 1, in the attachment CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx, December 9, 2025.

⁵ Liberty Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 10.

1 in September, 2025.⁶ Liberty explains that the amended dataset was assembled by
2 examining full event histories of each asset and selecting inspection records updated in
3 2020 that were either assigned a priority level or which included condition codes.⁷ While
4 both datasets derive from the same underlying 2020 Asset Survey, they reflect different
5 stages in Liberty’s data compilation and documentation process.

6 As a result, the amended dataset contains:

7

- 8 Fewer total rows than the original data request response,
- 9 Significantly more information relating to each asset, including administrative
and tracking fields,
- 10 Multiple records associated with individual inspections, reflecting internal
11 updates rather than additional field observations.

12 **Table 2 – Comparison of Original and Amended 2020 Asset Survey Datasets**

| Attribute | Original Dataset | Amended Dataset |
|---|--|--|
| Count of Rows | 1,358 | 1,180 |
| Count of Columns | 15 | 30+ |
| Unique Inspection | ~ 1,300 (approximately) | 531 |
| Unique Inspections with Condition Codes | Not explicitly separated | 513 |
| Inspection Population | Broad survey population including records with and without condition codes | Primarily condition coded inspection records |
| Record Structure | One row per inspection | Multiple rows per inspection corresponding to revision history |
| Administrative and Tracking Fields | Limited | Expanded (work management, metadata, status fields) |
| Repair Date Population | Incomplete for some inspections | Additional repair dates populated for some inspections |

⁶ Liberty response to CalAdvocates-LIB-A2506017-001, September 11, 2025. CalAdvocates-LIB-A2506017-001-Q2.xlsx.

⁷ Liberty response to CalAdvocates-LIB-A2506017-041, question 7, December 31, 2025.

Each row corresponding to the same Fulcrum ID reflects a different version in the event history associated with that Fulcrum ID. These versions may reflect record updates by inspectors performing inspections, by field crews performing repairs, or by non-field staff conducting other analysis and data clean-up. Each row can be differentiated by referencing the “version” number and the date and time in the “system_updated_at” field and by comparing the information contained in each field with the prior version.

1 Cal Advocates compared the original data request response with the amended data
2 request response. As shown in Table 2 above,⁸ the amended dataset introduces expanded
3 administrative fields and repeated inspection identifiers, reflecting internal tracking and
4 work management activity but does not include additional field inspection records. These
5 changes affect how inspection results and corrective actions appear when summarized
6 and require careful interpretation.

7 **B. What The Amended Dataset Actually Represents**

8 The original dataset provided in September 2025 reflects inspection results as they
9 existed when the 2020 Asset Survey results were first consolidated and organized, it
10 presents a “snapshot” view of inspection findings and the repair information available at
11 the time of the Mountain View Fire.

12 The amended dataset represents a post ignition reconstruction of those same
13 inspection records that was prepared by Liberty between September 2025 and December
14 2025.⁹ It incorporates information drawn from additional internal systems that were not
15 fully represented in the original data request response. As a result, the amended dataset
16 provides a more detailed view of how inspection findings were later documented and
17 tracked, but it does not represent a correction of the underlying inspection results
18 themselves.

19 **C. Notable Issues Reflected in the Amended Dataset**

20 Several notable issues emerge from review of the amended dataset. First, there are
21 duplicate inspection records, which suggests that multiple records now exist for the same
22 asset component. These records reflect administrative activity and internal tracking
23 rather than additional asset conditions.¹⁰

⁸ Table 2 is derived by comparing CalAdvocates-LIB-A2506017-001-Q2.xlsx to CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_amended.xlsx.

⁹ Liberty response to CalAdvocates-LIB-A2506017-042, question 4, December 31, 2025. “...data within the categories of risk ratings specified in this Question were added to the Fulcrum application for the 2020 detailed inspections/asset survey *after* 2020.”

¹⁰ Liberty response to CalAdvocates-LIB-A2506017-041, question 7, December 31, 2025.

1 Second, the amended dataset includes repair completion information not included
2 in the original production. For example, the amended dataset includes new columns for
3 construction complete date and inspection record update date. This affects how repair
4 activity appears in aggregate summaries and is one reason summary metrics, such as
5 repair timing statistics, differ between the two datasets. Repair timing, including whether
6 work was completed after scheduled due dates, is one indicator among several that must
7 be interpreted cautiously and at the inspection record level.

8 Third, when inspection records are reviewed at the asset and condition level rather
9 than as independent rows, the amended dataset continues to show that numerous
10 condition coded findings required follow up and corrective action.¹¹ The repetition of
11 condition codes across records associated with the same assets reflects ongoing tracking
12 rather than discrete new conditions.¹²

13 **D. Concentration of Condition Codes in the Amended Dataset**

14 An analysis of condition codes in the amended dataset shows that inspection
15 findings continue to be highly concentrated in a limited number of recurring condition
16 types. Table 3 summarizes the frequency of observed condition codes.¹³

Each row corresponding to the same Fulcrum ID reflects a different version in the event history associated with that Fulcrum ID. These versions may reflect record updates by inspectors performing inspections, by field crews performing repairs, or by non-field staff conducting other analysis and data clean-up. Each row can be differentiated by referencing the “version” number and the date and time in the “system_updated_at” field and by comparing the information contained in each field with the prior version.

¹¹ A condition coded finding is an inspection observation assigned a standardized condition code that reflects the severity or priority of an asset condition and is used to determine whether corrective action is required and the applicable repair timeframe.

¹² The amended dataset contains multiple inspection records for each asset.

¹³ Table 3 was created by examining the key performance indicators and trends extract from CalAdvocates-LIB-A2506017-001-Q2_amended.xlsx using PowerQuery.

Table 3 – 2020 Asset Survey Condition Codes

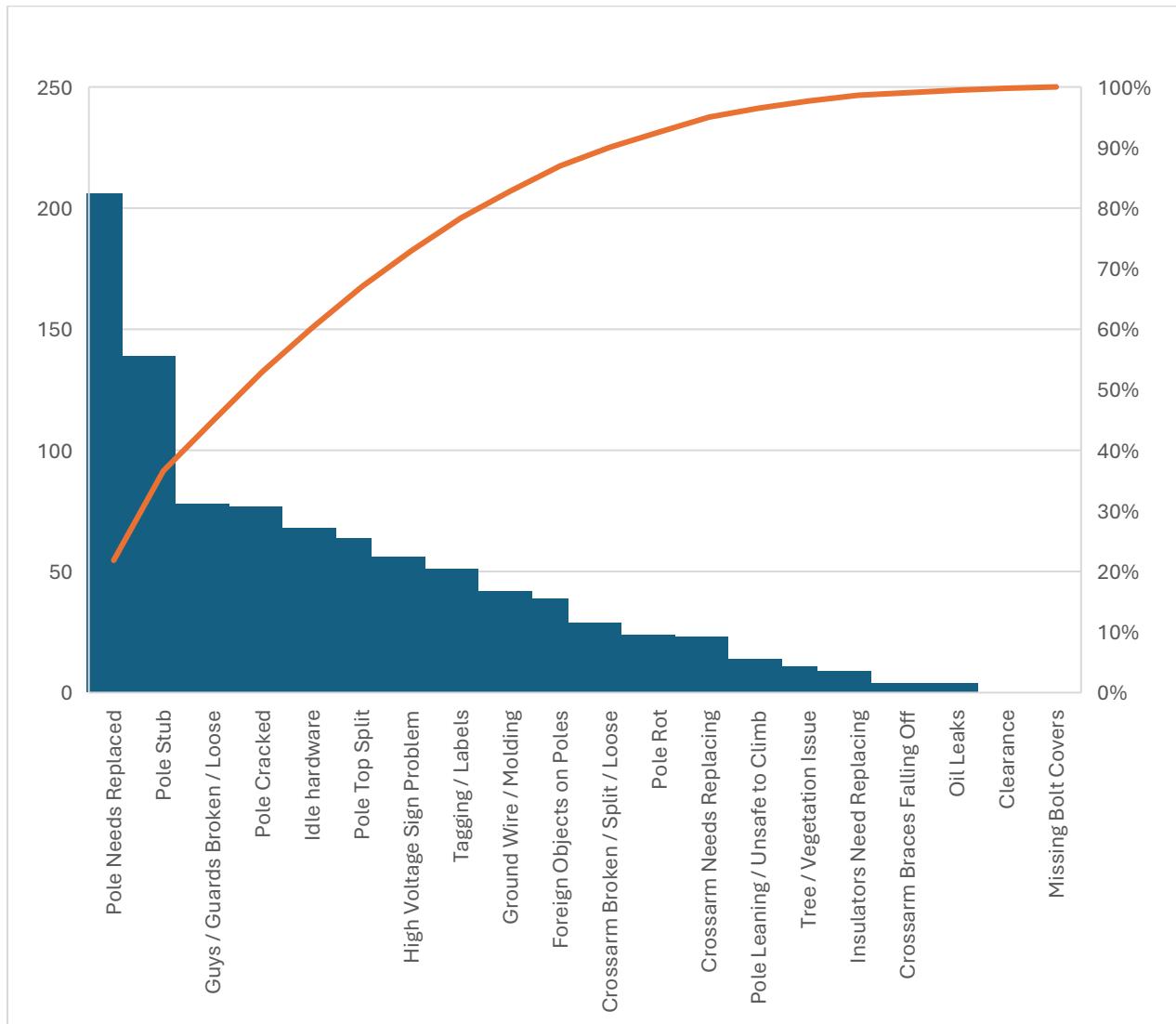
| Condition Code | Count | Percent of Total |
|---------------------------------|-------|------------------|
| Pole Needs Replaced | 206 | 21.8% |
| Pole Stub | 139 | 14.7% |
| Guys / Guards Broken / Loose | 78 | 8.3% |
| Pole Cracked | 77 | 8.2% |
| Idle hardware | 68 | 7.2% |
| Pole Top Split | 64 | 6.8% |
| High Voltage Sign Problem | 56 | 5.9% |
| Tagging / Labels | 51 | 5.4% |
| Ground Wire / Molding | 42 | 4.5% |
| Foreign Objects on Poles | 39 | 4.1% |
| Crossarm Broken / Split / Loose | 29 | 3.1% |
| Pole Rot | 24 | 2.5% |
| Crossarm Needs Replacing | 23 | 2.4% |
| Pole Leaning / Unsafe to Climb | 14 | 1.5% |
| Tree / Vegetation Issue | 11 | 1.2% |
| Insulators Need Replacing | 9 | 1.0% |
| Crossarm Braces Falling Off | 4 | 0.4% |
| Oil Leaks | 4 | 0.4% |
| Clearance | 3 | 0.3% |
| Missing Bolt Covers | 2 | 0.2% |

Key observations include:

- The single most frequent condition, “Pole Needs Replaced,” accounts for approximately 22% of all observed condition code instances.
- The top two conditions (Pole Needs Replaced and Pole Stub) together account for approximately 36% of all condition code observations.
- The top five conditions account for approximately 60% of all observed condition code instances.

1

Figure 1 - Pareto of Condition Codes in Amended Dataset



E. Interpretation of the Pareto Pattern

The distribution of inspection findings on the Topaz 1261 circuit were not broad or random. Instead, a relatively small number of recurring condition types dominate the inspection results. Several of the most prevalent condition codes, such as Pole Needs Replaced, Pole Stub, Pole Cracked, and Pole Top Split, are structural deficiencies directly associated with pole integrity and mechanical failure risk. These are not cosmetic or administrative issues, they represent degradation that, if left uncorrected, can contribute to conductor movement, hardware failure, or contact with vegetation as wind speeds or gusts increase.

1 The concentration of these structural condition codes mirrors the pattern identified
2 in Cal Advocate's original testimony on maintenance records: CA-07, wherein a limited
3 set of defect types also accounted for a disproportionate share of system risk.¹⁴

4 The concentration of condition codes provides important context for interpreting
5 other metrics in the amended dataset, including repair timing. Where a large share of
6 identified conditions involve structural defects requiring pole replacement or significant
7 remediation, corrective actions are inherently complex and resource-intensive.

8 Accordingly, the presence of repair timing variability in the amended dataset is
9 consistent with the type of conditions observed. The Pareto analysis reinforces that the
10 key issue is not whether minor conditions were addressed promptly, but whether the most
11 prevalent and consequential condition types were prioritized and mitigated in a manner
12 commensurate with wildfire risk.

13 **F. Repair Timing Statistics**

14 Cal Advocates' original testimony on asset inspection in CA-07 relied on Liberty's
15 original submittal of the 2020 Asset Survey. The original testimony highlighted that a
16 large percentage of inspected assets had condition coded findings requiring corrective
17 action. Review of Liberty's amended dataset reinforces the lack of corrective action,
18 although it presents the inspection results in a materially different form.

19 In the amended dataset, condition coded findings dominate the inspection
20 population. More than ninety-six percent of all rows contain one or more condition
21 codes.¹⁵ When the dataset is evaluated at the inspection level, rather than the row level,
22 the same pattern persists: 513 of 531 unique inspections, more than ninety-six percent,
23 involve condition coded failures.¹⁶ In other words, nearly every inspection represented in

¹⁴ Exhibit CA-07, at 15.

¹⁵ Liberty Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 1, in the attachment CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx, December 9, 2025. There are a total of 1,180 rows, and 1,140 of those rows have condition codes.

¹⁶ Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 1, in the attachment CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx, December 9, 2025. There are 531 unique inspection records, and 513 of those records contain condition codes.

1 the amended production identifies at least one condition requiring corrective action. As
2 well, the amended dataset largely omits the “pass” population that was present in the
3 original survey and that was reflected in the dataset relied upon in CA-07.

4 Within the amended dataset, only 393 inspection records of the 513 inspection
5 records contain both a repair due date and a repair completion date.¹⁷ For those records,
6 the repair was on average completed 42.4 days late, while the longest repair delay was
7 1,518 days (over 4 years) after the scheduled due date.

8 When considered alongside Liberty’s later disclosure of an ignition event on the
9 Topaz 1261 circuit, the concentration of high-risk condition codes heightens the
10 importance of timely and effective corrective action.

11 **G. Clarification Regarding Ignition History on the Topaz 1261**
12 **Circuit**

13 On receipt of the amended data request responses described in Table 1, Cal
14 Advocates issued clarifying data requests: CalAdvocates-LIB-A2506017-041 and
15 CalAdvocates-LIB-A2506017-042. Liberty’s responses to these data requests raised
16 concerns regarding the completeness of information provided especially about
17 operational risk history.

18 In September 2025, Liberty stated it was “not aware of any ignitions associated
19 with the Topaz 1261 Circuit prior to November 17, 2020.”¹⁸ However, in the response to
20 Cadvocates-LIB-A2506017-042, Liberty produced information indicating that in fact an
21 ignition had occurred on the Topaz 1261 circuit but that it was characterized as not
22 reportable under applicable criteria.¹⁹

¹⁷ Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 1, in the attachment CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx, December 9, 2025. In order to calculate if a repair was completed on time a record needed both due and completion dates. 393 records met that requirement.

¹⁸ Liberty’s response to data request CalAdvocates-LIB-A2506017-001, question 10, September 10, 2025.

¹⁹ Liberty’s response to data request CalAdvocates-LIB-A2506017-042, question 1 - 9, December 31, 2025.

1 While Liberty's amended response clarifies its interpretation of reporting
2 thresholds, the existence of an ignition event, irrespective of reporting issues, is relevant
3 to understanding the circuit's risk profile. These disclosures parallel the pattern observed
4 with the amended inspection dataset. That is, information bearing on risk and system
5 condition was not fully visible in the initial response to the data request and required
6 targeted follow up from Cal Advocates.

7 **III. CONCLUSION**

8 Liberty's amended responses shows that the 2020 asset survey data, as originally
9 produced, did not fully convey the condition, context, or risk profile of the Topaz 1261
10 circuit. The amended response to CalAdvocates-LIB-A2506017-001, Question 1
11 demonstrates that the inspection data relied upon in Cal Advocates testimony CA-07 was
12 later reconstructed by Liberty using different selection criteria, additional administrative
13 fields, and information drawn from multiple internal systems. That reconstruction
14 changed the composition and presentation of the inspection record, narrowing it to an
15 inspection population dominated by condition coded failures and altering how corrective
16 actions and repair timing appear when summarized.

17 At the same time, Liberty's later disclosure that an ignition had occurred on the
18 Topaz 1261 circuit, after initially stating that no ignitions were known, adds important
19 context that was not available when Cal Advocates testimony CA-07 was prepared.

20 Regardless of reportability, the existence of an ignition is relevant to
21 understanding circuit risk and the significance of recurring structural deficiencies
22 identified in the asset survey. When viewed together, the amended inspection data and
23 the revised ignition information show that the circuit was operating with known condition
24 issues in an environment where wildfire risk had already materialized.

25 The updates and changes identified in the December 9, 2025 and December 10,
26 2025 amended data request responses do not modify the findings identified in
27 Cal Advocates testimony CA-07 as it relates to the inspection records for Topaz 1261
28 from 2020. Instead, the amended responses clarify that the material information about
29 the condition of Topaz1261 and operational risks were dispersed across multiple systems

1 and that Liberty had not availed itself of or analyzed this information. As a result, CA-07
2 necessarily evaluated inspection results and corrective actions based on an incomplete
3 picture of the circuit's risk history.

4 The central question is not whether Liberty can now assemble a more complete
5 record after the fact, but whether the information available at the time of ignition was
6 sufficient to support continued operation of the Topaz 1261 circuit in a high wildfire-risk
7 setting. The amended disclosures underscore the importance of examining how
8 inspection findings, corrective actions, and ignition history were integrated, or not
9 integrated, into operational decision-making. That context is essential to assessing
10 whether Liberty's inspection, repair, and risk management practices were reasonable in
11 light of the hazards present on the system.

APPENDIX A

QUALIFICATIONS OF WITNESS

**PREPARED TESTIMONY AND QUALIFICATIONS
OF
CHARLES KYLE MADISON**

My name is Charles Kyle Madison. My business address is 915 L Street, Sacramento, California. I am employed by the California Public Utilities Commission as a Senior Utilities Engineer (Specialist) in the Public Advocates Office, Safety Branch, Fire Safety Section.

9 I earned a Master of Business Administration with a concentration in
10 organizational and operations management from the University of California at Davis.
11 Previously, I earned a Bachelor of Science degree in Mechanical Engineering with an
12 emphasis on controls and thermodynamics from the University of California at Davis. I
13 also studied at Villanova University where I earned a Master Certificate in Lean Six
14 Sigma.

15 I am also a licensed Mechanical Engineer in the State of California (license
16 number 31219), and I hold certifications in Lean Six Sigma, Project Management, and
17 Kanban Management.

18 I have 31 years of experience in the power and energy sector, having worked for
19 companies including Pacific Gas and Electric Company (PG&E), GE Power, and Shell
20 Oil. During my 16 years at PG&E, I held various roles, including:

- Electric Distribution Design Supervisor,
- Program Manager for Critical Operating Equipment,
- Program Manager for Service Connections on the Paradise Wildfire Rebuild Program, and
- Expert Data Analyst for Electric Distribution Maintenance.

26 I also was a witness for PG&E in Application 21-09-008, a cost-recovery
27 application for wildfire mitigation expenditures and catastrophic events.

28 I joined the Public Advocates Office in 2022 as a Senior Utilities Engineer
29 (Specialist) in the Safety Branch. My work in this role principally concerns wildfire
30 mitigation plans (WMPs) and related issues such as WMP guidelines and wildfire risk

1 modeling. I have participated in the Public Advocates Office's review of investor-owned
2 utilities' WMPs each year since 2022. In 2023 and 2024, I was the lead analyst assigned
3 to review Southern California Edison Company's (SCE) WMPs. I participate in
4 proceedings at the California Office of Energy Infrastructure Safety.

5 As a Senior Utilities Engineer (Specialist), I review wildfire mitigation plans by
6 assessing the adequacy and effectiveness of proposed mitigation initiatives, ensuring they
7 align with best practices and regulatory requirements to reduce fire risk. Additionally, I
8 analyze the utilities' asset management practices by monitoring quarterly data reports for
9 improvements in infrastructure, resource allocation, and implementation strategies, with
10 the aim of ensuring that they meet industry best practices and effectively reduce the
11 likelihood of ignition.

12 I have also contributed to Cal Advocates' analysis of wildfire safety and risk issues
13 in SCE's general rate case for test year 2025 (A.23-05-010).

14 In 2023 and 2024, I participated in SCE's application to recover costs associated
15 with the Thomas Fire and subsequent debris flows (A.23-08-013). I prepared and
16 sponsored testimony regarding overall prudence of operations. As the project leader, I
17 also coordinated the work of Cal Advocates' other witnesses.

18 In 2024 and 2025, I participated in SCE's application to recover costs associated
19 with the Woolsey Fire (A.24-10-002). I prepared and sponsored testimony regarding
20 overall prudence of operations.

21 This concludes my statement of qualifications.

APPENDIX B

SUPPORTING ATTACHMENTS

APPENDIX C

SUPPLEMENTAL

SUPPORTING ATTACHMENTS

LIST OF ATTACHMENTS FOR APPENDIX C

| Attachment # | Title |
|---------------|---|
| Attachment 1 | Response to data request CalAdvocates-LIB-A2506017-001, question 1, in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025. |
| Attachment 1A | CalAdvocates-LIB-A2506017-001-Q2.xlsx, December 9, 2025. |
| Attachment 2 | Liberty response (amended) to data request CalAdvocates-LIB-A2506017-001, question 1, in the attachment CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx, December 9, 2025. |
| Attachment 2A | CalAdvocates-LIB-A2506017-001-Q2_Amended, December 9, 2025 - CONFIDENTIAL |
| Attachment 3 | Liberty response to CalAdvocates-LIB-A2506017-041, question 7, December 31, 2025. |
| Attachment 4 | Liberty response to CalAdvocates-LIB-A2506017-042, question 4, December 31, 2025. |

Attachment 1

**Response to data request
CalAdvocates-LIB-A2506017-001,
question 1, September 10, 2025**



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

September 10, 2025

Liberty Utilities (CalPeco Electric) LLC

A.25-06-017
WEMA

The Public Advocates Office

Data Request No.: CalAdvocates-LIB-A2506017-001
Requesting Party: Public Advocates Office
Originator: Charles Madison, Charles.Madison@cpuc.ca.gov
Aaron Louie, Aaron.Louie@cpuc.ca.gov
Patrick Huber, Patrick.Huber@cpuc.ca.gov
Cc: Matthew Karle, Matthew.Karle@cpuc.ca.gov
Date Received: August 19, 2025
Due Date: September 3, 2025
Extension Granted: September 10, 2025

REQUEST NO. 1:

Provide an Excel file that contains all corrective work identified in 2010-2020 by the routine or annual patrol program affecting the Topaz 1261 circuit.

Each asset work order should be in a row. The file should contain the following columns of data:

- a) Structure number
- b) Work Order Number
- c) Notification Number (if applicable)
- d) Equipment Number
- e) Inspection Date
- f) Equipment Type
- g) HFTD/HFRA Tier
- h) Priority
- i) Ignition Risk (Y/N)
- j) Date Created
- k) Due Date

- l) Revised Due Date (if applicable)
- m) Priority Change (if applicable)
- n) Reason for Change (if applicable)
- o) Date Completed
- p) Latitude in degrees
- q) Longitude in degrees.

RESPONSE:

Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not maintained by Liberty in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows: As explained in *Liberty-03: Prudence of Operations*, Liberty conducted routine patrols using hard-copy circuit maps. *See* Liberty-03 at 20. After a reasonable search and diligent inquiry, the Topaz 1261 maps used for Liberty's patrols from 2013, 2015, and 2017 do not indicate any corrective work identified by those patrols.

REQUEST NO. 2:

Provide an Excel file that contains all corrective work identified in 2010 - 2020 by the detailed inspection program affecting the Topaz 1261 circuit.

Each asset work order should be in a row. The file should contain the same columns of data listed in Question 1 above.

RESPONSE:

Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not maintained by Liberty in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows:

Liberty is producing the data requested by this Question in the tab "Detailed Inspection Results" in the attachment *CalAdvocates-LIB-A2506017-001-Q2.xlsx*. As described in *Liberty-03: Prudence of Operations*, Liberty transitioned to Fulcrum for detailed inspection records in 2020 and has continued to refine its data collection process since that time. Liberty has included select data fields that Liberty understands to be responsive to this Question, to the extent available in Liberty's records. This spreadsheet contains detailed inspection records from 2020 for the entire Topaz 1261 Circuit, regardless of whether corrective work was identified from the inspection. As described in *Liberty-03: Prudence of Operations*, prior to 2020, inspectors recorded the results of detailed inspections on physical forms and thus, Liberty is unable to provide an Excel file with the requested information for detailed inspections prior to 2020.

REQUEST NO. 3:

Provide an Excel file that contains all corrective work identified in 2010 - 2020 by any infrared inspection programs affecting the Topaz 1261 circuit.

Each asset work order should be in a row. The file should contain the same columns of data listed in Question 1 above.

RESPONSE:

Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows: Liberty did not have an infrared inspection program during the specified time frame.

REQUEST NO. 4:

Provide an Excel file that contains all corrective work identified in 2010 - 2020 by the intrusive pole inspection program affecting the Topaz 1261 circuit.

Each asset work order should be in a row. The file should contain the same columns of data listed in Question 1 above.

RESPONSE:

Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not maintained by Liberty in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows:

Please see attachment *CalAdvocates-LIB-A2506017-001-Q4.xlsx*, which contains available data related to intrusive pole inspections conducted on the Topaz 1261 Circuit in 2013, the only year between 2011 and 2020 in which such inspections were performed on this circuit. This spreadsheet contains three tabs for corrective work identified by these inspections: "Restorable" – poles that were identified for reinforcement; "Non-Restorable" – poles that were identified for replacement; and "Hazard Poles" – poles that were identified for urgent replacement. Liberty addressed corrective work using hard-copy work packets during the specified time frame; following a reasonable search and diligent inquiry, Liberty has not located records showing when the corrective work was completed.

REQUEST NO. 5:

- a) What constituted an asset work order being "overdue," according to Liberty's policies at the time of the Mountain View Fire?

b) What were considered valid reasons for delays in remediating asset work orders, according to Liberty policies at the time of the Mountain View Fire?

RESPONSE:

Liberty objects to this Question as vague and ambiguous as to the term “asset work order” and “valid reasons for delays.” Subject to and without waiving its objections, Liberty responds as follows:

- a) Liberty understands the term “asset work order” to refer to conditions requiring corrective actions in relation to a Liberty asset. At the time of the Mountain View Fire, Liberty assigned due dates for conditions based on the regulatory requirements set forth by GO 95, Rule 18. An “overdue” condition is one that is past the due date assigned by Liberty and applicable regulatory requirements.
- b) Liberty understands the phrase “valid reasons for delays” to refer to reasons by which remediation times may be extended beyond the deadlines prescribed by regulatory requirements. Not all conditions were compliance-based issues. Those conditions not related to compliance were not subject to regulatory requirements. For compliance-based conditions, Liberty attempted to complete all remediation by the assigned due dates. For some conditions, factors beyond Liberty’s control, such as permitting, customer refusal, access difficulties, and emergencies such as the Covid-19 pandemic, may cause Liberty to require additional time to complete the remediation. GO 95, Rule 18(A)(2)(b) allows such “reasonable circumstances” to justify an extension of correction times.

REQUEST NO. 6:

- a) How did Liberty assess the wildfire risk associated with overdue asset work orders at the time of the Mountain View Fire?
- b) What criteria did Liberty use to determine whether an overdue asset work order posed an immediate wildfire risk?
- c) At the time of the Mountain View Fire, what role did fire risk play in determining the priority classification of conditions (with respect to asset work orders)?

RESPONSE:

Liberty objects to this Question as vague and ambiguous as to the term “asset work order.” Subject to and without waiving its objections, Liberty responds as follows:

- a) Liberty understands the term “asset work order” to refer to conditions requiring corrective actions in relation to a Liberty asset. Liberty assessed the wildfire risk associated with asset work orders by assessing whether an asset was located within the Commission’s High Fire Threat District and assigning the corresponding due dates as set forth in GO 95, Rule 18. As explained in its response to Question 5 of this set of data requests, Liberty attempted to complete all compliance-based conditions by the assigned due dates.

b) - c) Please see Liberty's response to subpart (a).

REQUEST NO. 7:

Please provide all records of any asset maintenance notifications on the Topaz 1261 circuit that were open as of November 17, 2020. Provide a spreadsheet with a row for each notification.

Please provide the following columns of data:

- a) Structure number
- b) Work Order Number
- c) Equipment Number
- d) Inspection Date
- e) Equipment Type
- f) HFTD/HFRA Tier
- g) Priority
- h) Ignition Risk (Y/N)
- i) Date Created
- j) Due Date
- k) Revised Due Date (if applicable)
- l) Priority Change (if applicable).
- m) Reason for Change (if applicable)
- n) Date Completed
- o) Latitude in degrees
- p) Longitude in degrees

RESPONSE:

Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not kept in the ordinary course of business. Subject to and without waiving these objections, Liberty responds as follows: Liberty understands this Question to be asking for conditions that were identified on or before November 17, 2020, and not yet remediated as of November 17, 2020. Because Liberty transitioned to Fulcrum for detailed inspection records in 2020 and that database does not include asset inspection records performed using hard-copy forms prior to 2020, Liberty can provide a list of poles inspected in 2020 which had repairs performed after November 17, 2020. Many of these repairs appear to be associated with conditions identified in detailed inspections conducted in 2020, but some may not be. Please see the tab "Repaired After Nov 17, 2020" in *CalAdvocates-LIB-A2506017-001-Q2.xlsx*, attached to Liberty's Response to Question 2 of this set of data requests. Please note that Liberty did not track some of the information requested by this Question.

REQUEST NO. 8:

In the ten years prior to the Mountain View Fire (2010 - 2020), were any splices installed on the conductor on the Topaz 1261 16kV circuit? If so, provide an Excel spreadsheet with the following information for each splice installed:

- a) Date the splice was determined to be necessary.
- b) Structure number at the upstream end of the span where the splice was installed.
- c) Structure number at the downstream end of the span where the splice was installed.
- d) Method(s) used to identify the need for a splice.
- e) Work order number used to install splice.
- f) Date work order was created.
- g) Date work order was completed.

RESPONSE:

Liberty objects to this Question as overly burdensome to the extent it seeks records and information not kept in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows: Liberty installed splices on the Topaz 1261 Circuit as needed in connection with operation of the distribution system. As referenced in *Liberty-02: Ignition*, splices were present on the lines in the Subject Span. *See* Liberty-02 at 7. After a reasonable search and diligent inquiry, Liberty has not located records showing when and where splices were installed on the Topaz 1261 Circuit or methods used to identify the need for splice installation.

REQUEST NO. 9:

In the ten year period leading up to the Mountain View Fire (2010 - 2020), was the Topaz 1261 circuit reviewed under Liberty's circuit reliability program?

- a) Provide a list of any recommendations that resulted from any reviews in the 10 year period leading up to the Mountain View Fire.
- b) Under the program's risk assessment process, what was the Topaz 1261 circuit ranked?
- c) Was the Topaz 1261 circuit's rank determined by an overall average circuit score?
- d) Were there any circuit segments of the Topaz 1261 circuit that scored high enough to warrant an urgent replacement?
- e) If the answer to (d) is "yes", provide a list of the relevant circuit segments (i.e. structure numbers at each end).

RESPONSE:

- a) - e) Liberty objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows: Consistent with D.16-01-008, Liberty reviewed the reliability of its electric system on an annual basis. Liberty's reliability reports are publicly available on the Commission's website at: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/electric-reliability/electric-system-reliability-annual-reports>. These reliability reports identified the Topaz 1261 as a circuit that experienced more frequent outages. As a result of these findings and because the Topaz 1261 Circuit is exposed to harsh weather conditions, Liberty prioritized this circuit for system hardening. As explained in SCE-03: Prudence of Operations (pp. 17-18), the Topaz 1261 Rebuild

Project was a Commission-approved multiyear project designed to improve circuit reliability and mitigate wildfire risk on Liberty's portion of the Topaz 1261 Circuit. As of November 17, 2020, Liberty was in the process of implementing phase five of the project.

REQUEST NO. 10:

Provide an Excel spreadsheet listing all ignitions in 2010 through 2020 on the Topaz 1261 Circuit.

Each ignition should be a row. Provide the following data as columns:

- a) Ignition date
- b) Ignition time
- c) Latitude of ignition
- d) Longitude of ignition
- e) Number of nearest pole
- f) Acres burned
- g) Cause, if identified
- h) Whether the ignition was a CPUC-reportable incident (Y/N)
- i) Whether Liberty had any asset corrective notifications at the ignition location, that were open at the time of the ignition (Y/N)
- j) Whether the ignition was linked to an asset corrective notification that existed at the time (Y/N)
- k) ID number of the nearest protective device upstream of the ignition
- l) Longitude in degrees of the device identified in part (k)
- m) Latitude in degrees of the device identified in part (k)
- n) Whether the device identified in part (k) tripped

RESPONSE:

Liberty objects to this Question as overly burdensome to the extent it seeks records and information not kept in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving these objections, Liberty responds as follows: Liberty is not subject to ignition reporting under D.14-02-015. From the start of Liberty's operations in approximately 2011 to 2020, Liberty is not aware of any ignitions associated with the Topaz 1261 Circuit prior to November 17, 2020.

REQUEST NO. 11:

Provide an Excel spreadsheet listing all wire-down events in 2010 through 2020 on the Topaz 1261 circuit. Each wire-down event should be a row. Provide the following data as columns:

- a) Date of wire-down event
- b) Time of wire-down event
- c) Latitude of wire-down event

- d) Longitude of wire-down event
- e) Number of nearest pole
- f) Cause, if identified
- g) Whether Liberty had any asset corrective notifications at the location, that were open at the time of the wire-down event (Y/N)
- h) Whether the wire-down event was linked to an asset corrective notification that existed at the time (Y/N)
- i) ID number of the nearest protective device upstream of the wire-down event
- j) Longitude in degrees of the device identified in part (i)
- k) Latitude in degrees of the device identified in part (i)
- l) Whether the device identified in part (i) tripped

RESPONSE:

Liberty objects to this Question as overly burdensome to the extent it seeks records and information not kept in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving these objections, Liberty responds as follows: Please see *CalAdvocates-LIB-A2506017-001-Q11.xlsx*, which contains available information in Liberty's possession regarding reported wire down events between 2016-2020. Liberty identified these events by querying its outage management system (OMS) for wire down events and reviewing the comments and resolution to determine if a valid wire down condition existed.

As explained in *Liberty-03: Prudence of Operations* (pp. 32-33), Liberty's system was operated by NV Energy's system control center for a portion of the time period requested in this Question. Liberty's records for the requested data date back to approximately 2016. Please note that Liberty did not track the information requested in subparts (g)-(h) of this Question in relation to wire down events and that Liberty is producing the information requested in subparts (c)-(d) and (j)-(k) in the projected coordinate system format (NAD_1983_UTM_Zone_11N) as maintained in its GIS.

REQUEST NO. 12:

Please provide an Excel spreadsheet listing each outage that occurred from 2010 - 2020 on the Topaz 1261 circuit (or any portion of the Topaz 1261 circuit). The spreadsheet should list each outage in a row, with the following column headings:

- a) Circuit segment ID #
- b) Date of outage
- c) Start time of outage
- d) Cause of outage
- e) For outages due to equipment failures, please state the specific type of equipment that failed. (for example: transformer failure, conductor failure, splice failure, etc.)
- f) Outage duration in minutes
- g) The type of protective device that tripped
- h) The equipment number of the protective device that tripped
- i) Latitude in degrees of the protective device that tripped

j) Longitude in degrees of the protective device that tripped

RESPONSE:

Liberty objects to this Question as overbroad to the extent that it seeks information prior to the start of its operation in approximately 2011, when it purchased the utility system from NV Energy. Subject to and without waiving these objections, Liberty responds as follows: Please see *CalAdvocates-LIB-A2506017-001-Q12.xlsx*, which contains the available outage information in Liberty's possession between 2016-2020. As explained in *Liberty-03: Prudence of Operations* (pp. 32-33), Liberty's system was operated by NV Energy's system control center for a portion of the time period requested in this Question. Liberty's records for the requested data date back to approximately 2016. Please note that Liberty did not track the information requested in subpart (a) of this Question in relation to outages and that Liberty is producing the information requested in subparts (i)-(j) in the projected coordinate system format (NAD_1983_UTM_Zone_11N) as maintained in its GIS.

REQUEST NO. 13:

Provide a complete list of all wildfire risk mitigation measures Liberty developed or implemented between 2010 and November 2020.

- a) Among the identified wildfire risk mitigation measures, which ones were proactive (that is, not implemented in response to specific, prior safety failures)?
- b) How did Liberty determine the necessity and priority of the proactive wildfire risk mitigation measures identified in your response to part (a)?
- c) What criteria or guidelines did Liberty follow in developing and implementing wildfire risk mitigation measures during the specified period?

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Liberty further objects to the extent that this Question seeks information prior to the start of its operation in approximately 2011, when it purchased the utility system from NV Energy. Liberty further objects to the term "proactive" in subparts (a) and (b). Wildfire mitigation measures are generally based on a utility's specific risk profile and past experience and are intended to proactively mitigate future wildfire risk. Distinguishing between measures that are "proactive" and those "in response to specific, prior safety failures" is not possible. Subject to and without waiving its objections, Liberty responds as follows:

Please refer to attachments *Fire Prevention Plan for Overhead Electric Facilities (2012).pdf*, *Wildfire Mitigation Plan (2019).pdf*, *Revised 2020 Wildfire Mitigation Plan.pdf*, and *2021 Wildfire Mitigation Plan Update (Public Version).pdf*. for detailed information regarding Liberty's wildfire mitigation efforts during the specified time frame. Although Liberty had not experienced a large wildfire attributed to its electrical infrastructure since taking over from Sierra Pacific in 2011, Liberty recognized the risk of wildfires within its service area and took steps to mitigate that risk. Liberty's opening testimony described wildfire risk mitigation measures that Liberty had adopted or was in the process of developing as of November 2020 (see, e.g., Liberty-03 at 10-13), including:

- Patrols of circuits in high-fire areas during high wind conditions
- Implementing “fire settings” for reclosers
- Pausing discretionary maintenance and vegetation management activities during fire threat conditions
- Conducting a detailed system-wide asset survey
- Piloting a LiDAR inspection of its distribution system for vegetation clearance
- Installing covered conductor, including on the Topaz 1261 Circuit
- Undergrounding certain lines
- Installing larger size conductors
- Replacing and upgrading distribution poles
- Replacing expulsion fuses
- Deploying monitoring sensors and SCADA-enabled devices
- Installing weather stations to support situational awareness
- Developing a Fire Potential Index (FPI) to forecast wildfire risk
- Implementing a Public Safety Power Shutoff (PSPS) program
- Increasing the frequency of vegetation management inspections
- Removing dead and dying trees in high tree mortality areas
- Hiring additional personnel to manage emergency response activities

Attachment 1A

**CalAdvocates-LIB-A2506017-001-Q2.xlsx,
December 9, 2025.**

| | | | | | | | | | |
|--------|--------------------------------------|-----------|------|---|---------|-----------|--|--|--|
| 191746 | 65c620d3-77c0-4b7-3b0e-11f94d3a07b5 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266625 | 0633232b-0115-4e7c-950b-098512316d4 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266621 | d9253a1e-9891-4cc-b115-02099222a015 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266624 | 38976642-0165-4b2-82f-21706b138d8 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 199418 | 326411fc-4e11-4b3-82f-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266625 | 89d5d45e-1b6-4e2-97d-ec0-0734009033 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266619 | 72d4d159-0423-4851-8a89-c2721229894 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266619 | 72d4d159-0423-4851-8a89-c2721229894 | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266618 | 7d8cf691-08ad-4b26-8d8-09852159e745 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266604 | 1d4f612e-1ac5-424b-8d8-09852159e745 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266605 | 1d4f612e-1ac5-424b-8d8-09852159e745 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266615 | 141796e1-9e4-4241-8d8-09852159e745 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 6d356e29-5710-4c54-82f-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266610 | 2b33e3d4-e5b1-438b-b4c5-576526d3e97 | 4/17/2020 | Pole | 2 | Level 3 | 4/10/2020 | | | |
| 266607 | c62b02c2-0014-48d7-881a-091d0603391 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266615 | 062d95a9-08d-4e2-9d8-09852159e745 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266608 | 2e7813ab-138-4b3-8d7-91c2e59269753 | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266604 | 1b16603-52-4268-b64-0224b4626e67 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 40111 | 05367452-0414-4b8-91f-4-04d2f9729a | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266604 | 05367452-0414-4b8-91f-4-04d2f9729a | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 156736 | b2736579-0009-4c03-9994-441926515647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266610 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266607 | 4743d97-18a5-4960-1d1f-956623069379 | 4/17/2020 | Pole | 2 | Level 3 | 4/10/2020 | | | |
| 266615 | 062d95a9-08d-4e2-9d8-09852159e745 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 2e7813ab-138-4b3-8d7-91c2e59269753 | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | Pole | 2 | non-go | 4/10/2020 | | | |
| 266607 | 462d2c67-0285-4a7b-87d-01a9495647 | 4/17/2020 | Pole | 2 | pass | 4/10/2020 | | | |
| 266609 | 5d401018-451-4b1-891-979-5fb05a51d | 4/17/2020 | P | | | | | | |

Attachment 2

Response (amended) to data request CalAdvocates-LIB-A2506017-001, December 9, 2025

CONFIDENTIAL

Attachment 2A

**CalAdvocates-LIB-A2506017-001-Q2_Amended,
December 9, 2025**

CONFIDENTIAL

Attachment 3

**Response to data request
CalAdvocates-LIB-A2506017-041,
question 7, December 31, 2025**



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

December 31, 2025

Liberty Utilities (CalPeco Electric) LLC

A.25-06-017
WEMA

The Public Advocates Office

Data Request No.: CalAdvocates-LIB-A2506017-041

Requesting Party: Public Advocates Office

Originator: Charles Madison, Charles.Madison@cpuc.ca.gov

Talal Harahsheh, Talal.Harahsheh@cpuc.ca.gov

Patrick Huber, Patrick.Huber@cpuc.ca.gov

cc: Matthew Karle, Matthew.Karle@cpuc.ca.gov

Travis Foss, Travis.Foss@cpuc.ca.gov

Aaron Louie, Aaron.Louie@cpuc.ca.gov

Cal Advocates Wildfire Discovery,
CalAdvocates.WildfireDiscovery@cpuc.ca.gov

Date Received: December 16, 2025

Due Date: December 31, 2025

Provide written responses and supporting documentation to adequately explain, define, and reconcile the data contained in *CalAdvocates-LIB-A2506017-001-Q2.xlsx* and *CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2 Amended*.

All questions pertain to **CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2 Amended.xlsx**.

REQUEST NO. 1:

For each of the columns identified below, please provide a complete data definition.¹

¹ The definition should clearly describe all permissible values for the column, including both explicit values (such as Yes, No, Passed, or Failed) and implicit values (such as null, blank, zero, or system generated defaults). Also, please explain the meaning of any null values and specify whether a null indicates that the value is not applicable or unknown, not yet assessed, or missing due to a data entry omission.

- a) Column C: updated_at
- b) Column G: system_updated_at
- c) Column H: version
- d) Column I: change_type
- e) Column J: status
- f) Column AB: repaired_all
- g) Column AC: repaired_go165
- h) Column AE: repair_by_due_date
- i) Column AG: repair_date
- j) Column AI: pole_replaced
- k) Column AJ: grey_wire_replaced
- l) Column BP: pole_issue_split_rot_stub_etc
- m) Column BQ: pole_replacement
- n) Column BY: confirm_pole_replace
- o) Column BS: condition_codes_for_failed_inspections
- p) Column BT: condition_codes_for_failed_inspections_other
- q) Column BU: inspection_comments

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Please note that, with respect to subpart (h), Column AE of *CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2 Amended.xlsx* corresponds to “planned_repair_date” and “repair_by_due_date” corresponds to Column AF. Liberty understands that subpart to be asking about “repair_by_due_date.” Liberty is providing the information requested in this question, based on its current understanding of fields contained within the Fulcrum application used for the 2020 detailed inspections/asset survey, in attachment *CalAdvocates-LIB-A2506017-041-Q1.xlsx*.

REQUEST NO. 2:

Filter the data in Column BR by “Level 3.” There are inspections marked as “Passed” in Column J that report condition codes, including but not limited to ”Pole Leaning/Unsafe to Climb,” “Pole_Needs_Replaced,” and “Pole_Top_Split.”

Provide an explanation addressing:

- a) The definition of “Passed” inspection. Provide a copy of any procedure, standard, or other documentation of this definition.
- b) The circumstances under which a “Passed” inspection may:
 - i. Contain condition codes; and
 - ii. Indicate severe structural deficiencies;
- c) Provide a list of condition codes that automatically trigger a failed inspection designation;
- d) The sequence in which inspection status and condition codes are determined; and
- e) Whether inspection status may be overridden by supervisory review or automated processes.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Liberty further objects to this Question as assuming facts. Subject to and without waiving its objections, Liberty responds as follows:

- a) During the 2020 detailed inspections/asset survey, Liberty focused on identifying conditions and issues on its system requiring remediation and updating its asset inventory. Liberty is not aware of a written policy or procedure that specifically defined a “pass” inspection for the 2020 detailed inspections/asset survey. As shown in *CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx*, for the few “pass” inspections that had remediations identified, those remediations were designated as priority level 3, which meant that they had low potential impact to safety or reliability and would be subject to future inspection.
- b) Please refer to Liberty’s response to subpart (a).
- c) Please refer to Liberty’s response to subpart (a). The “status” field in the Fulcrum application used for the 2020 detailed inspections/asset survey included a pre-set menu of options for selection and was not dependent on information entered into fields related to condition codes.
- d) Please refer to Liberty’s response to subparts (a) and (c). The Fulcrum application used for the 2020 detailed inspections/asset survey did not prescribe a specific sequence for entering information.
- e) Liberty does not understand this subpart as framed. Please refer to Liberty’s response to subparts (a), (c) and (d).

REQUEST NO. 3:

At the time of the Mountain View Fire:

- a) Did Liberty have any written procedures, standards, or policies governing the relationship between inspection status and condition codes?
- b) If the answer to subpart (a) is “yes,” please provide a copy of the document that was the current version.
- c) If the answer to subpart (a) is “no,” please explain why.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

- a) Please refer to Liberty’s response to Question 2 of this set of data requests.
- b) N/A
- c) Please refer to Liberty’s response to Question 2 of this set of data requests.

REQUEST NO. 4:

For each of the columns identified below, provide complete data definitions:

- a) Column CS: liberty_overall_risk_rating;
- b) Column CT: reaxrating;
- c) Column CU: reax_risk_calc_value_x2;
- d) Column CW: condition_code_risk_rating; and
- e) Column CY: overall_risk_calculated_value.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: As evidenced in *CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx* and *CONFIDENTIAL-CalAdvocates-LIB-A2506017-31-Q3.csv*, data within the categories of risk ratings specified in this Question were added to the Fulcrum application for the 2020 detailed inspections/asset survey *after* 2020.

- a) Liberty understands “liberty_overall_risk_rating” to be a risk rating assigned based on the “overall_risk_calculated_value” using the following scale: 1-5 was “Low”, 6-10 was “Moderate”, 11-13 was “High”, and 14-21 was “Very High.”
- b) Liberty understands “reaxrating” to be a risk rating based on wildfire risk modeling conducted by Reax Engineering. The “reaxrating” categories were Low, Moderate, High, and Very High.
- c) Liberty understands “reax_risk_calc_value_x2” to be a numerical score based on “reaxrating.” A numerical rating is first assigned to the “reaxrating”: 1 for Low; 2 for Moderate; 3 for High; and 4 for Very High and then multiplied by two for the values contained in “reax_risk_calc_value_x2”.
- d) Liberty understands “condition_code_risk_rating” to be a risk rating based on the safety and reliability risk of the condition code(s) associated with an asset location, as assigned by operations. Liberty understands that condition codes were sorted into three risk categories as follows, with corresponding numerical scores:

| 3 - High | 2 - Moderate | 1 - Low |
|-------------------------|---------------------|--------------------------|
| Cross Arm Replace | Bare Jumpers | Foreign Objects on Pole |
| Oil Leaks | Grey Wire | Ground Wire / Molding |
| Pole Cracked | Missing Bolt Covers | Guys/Guards Broken/Loose |
| Pole Leaning/ Unsafe | Need Stirrups | High Voltage Sign |
| Pole Replace | Pole Stub | Hotline Clamps |
| Vegetation Issue | Pole Top Split | Idle Hardware |
| | Arrestor | Tagging/Labels |
| | Clearance | |
| | Equipment Anchors | |
| | Insulator/Replace | |

- e) Liberty understands “overall_risk_calculated_value” to be the sum of “reax_risk_calc_value_x2”, “condition_code_risk_value” (the numerical score associated with “condition_code_risk_rating”), and “condition_code_count” (which indicates the total number of condition codes associated with an asset location).

REQUEST NO. 5:

For each column identified in question 4:

- a) Explain how the risk score or value is calculated and interpreted, including the source (e.g., model, consultant, etc.), scale of values, the thresholds that define (e.g. low, medium, and high risk), and what an assigned score signifies in terms of asset condition and required action.
- b) State whether the risk score is calculated automatically, manually adjusted, or subject to override.
- c) Describe how the risk score is applied operationally, including use in repair prioritization, replacement decisions, compliance reporting, and fire risk mitigation.
- d) State whether the risk score triggers mandatory action, is advisory only, or may be disregarded under specified circumstances.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

- a) Please refer to Liberty's response to subpart (c) below and to Question 4 of this set of data requests.
- b) Please refer to Liberty's response to Question 4 of this set of data requests.
- c) Please refer to Liberty's response to Question 4 of this set of data requests. As noted in that response, the risk ratings were added *after* the 2020 detailed inspections/asset survey and, as such, Liberty is not aware of a formal policy or procedure applying the risk ratings to prioritization of corrective work identified in 2020. Liberty understands that the risk ratings were part of Liberty's initial work in the 2021-2022 timeframe to develop a risk-based prioritization framework. Liberty's work developing a risk-based decision-making framework were described in detail in its WMP filings and has evolved over time. As described in Liberty's amended response to CalAdvocates-LIB-A2506017-016, Question 2(a), Liberty generally prioritized corrective work identified during the 2020 detailed inspections/asset survey by priority level, accounting for location within HFTDs.
- d) Please refer to Liberty's response to subpart (c) above and to Question 4 of this set of data requests.

REQUEST NO. 6:

- a) Were any formal standards, procedures, or policies governing these risk scores in effect at the time of the Mountain View Fire?
- b) If the answer to subpart (a) is "yes," provide the procedure, its effective date, and any revisions in effect prior to the incident.
- c) If the answer to subpart (a) is "no," explain how risk was assessed and acted upon at that time.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

- a) Liberty understands the term "risk scores" to refer to the categories of risk ratings described in Question 4. Please refer to Liberty's response to Question 4 of this set of data requests, which describes that risk ratings were not available in 2020 and were only

added *after* 2020 to the records contained within the Fulcrum application for the 2020 detailed inspections/asset survey.

- b) N/A
- c) Liberty does not understand this subpart as framed. Liberty is willing to meet and confer with Cal Advocates on this request.

REQUEST NO. 7:

Column A contains 531 unique FULCRUM IDs, with most IDs appearing multiple times and sharing overlapping or similar dates and attributes.

Please explain:

- a) Whether multiple rows per FULCRUM ID represent chronological updates, separate inspections, or versioned records of the same inspection;
- b) How original inspection records are distinguished from amendments, corrections, or system-generated duplicates; and
- c) Whether the dataset contains full inspection histories, partial histories, or only the most recent record per inspection.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

- a) Please refer to Liberty's response to CalAdvocates-LIB-A2506017-031, Question 3 and Liberty's amended response to CalAdvocates-LIB-A2506017-001, Question 2. As described in those responses, each row corresponding to the same Fulcrum ID reflects a different version in the event history associated with that Fulcrum ID. These versions may reflect record updates by inspectors performing inspections, by field crews performing repairs, or by non-field staff conducting other analysis and data clean-up. Each row can be differentiated by referencing the "version" number and the date and time in the "system_updated_at" field and by comparing the information contained in each field with the prior version.
- b) Please refer to Liberty's response to subpart (a).
- c) Please refer to Liberty's amended response to CalAdvocates-LIB-A2506017-001, Question 2.

REQUEST NO. 8:

Please explain:

- a) Why a large number of inspections indicate that repairs were required but have no recorded repair completion date (e.g. rows 12 – 14 or 43 – 47);
- b) Why there are inspections where the priority (column BR) is "Level 3" but the Liberty Overall Risk Rating (column CS) and Reax Rating (column CT) are both risk scored as "Very High" (e.g., rows 601 or 1145);
- c) Why pole numbers 40468 and 163564 have the highest risk score of "18" in the file AND "Very High" risk scores but were graded as "Level 3" repairs (e.g., rows 601 or 1145);

- d) Why “GIS Confirmed,” “Asset Tracking Pass,” “Asset Tracking,” and “Asset Tracking priority 3” appears in the “repaired_by” column (column AH) in lieu of specific dates (e.g., rows 892, 142, 368, and 448, respectively);
- e) The difference between “construction_completion_date” (column AW) and “repair_date” (column AG);
- f) Why there are blanks/null values in the “construction_completion_date” (column AW) (e.g. rows 2 – 10);
- g) Why there are only 3 unique values (i.e. 44846, 44356, and 44723) in the “construction_completion_date” (column AW); and
- h) Why the “pole_replacement” column (column BQ) and the “pole_replaced” column (column AI) happens to be blank or contain null values but the correction code calls for a pole replacement. (e.g. pole number 266603).

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

- a) Please refer to Liberty’s response to CalAdvocates-LIB-A2506017-031, Question 3 and to Question 7 of this set of data requests and Liberty’s amended response to CalAdvocates-LIB-A2506017-001, Question 2. As described in those responses, there are multiple rows corresponding to the same Fulcrum ID and reflecting different versions in the event history associated with that Fulcrum ID. Thus, most rows in which repairs were required and no repair completion date is recorded correspond to versions of a Fulcrum ID’s event history prior to the repair having been completed. In addition, as referenced in Liberty’s amended response to CalAdvocates-LIB-A2506017-016, Question 2(b), as of October 3, 2025, Liberty was still addressing a small number of corrective work orders identified during the 2020 detailed inspections/asset survey. Accordingly, a small number of rows containing required repairs and no repair completion dates correspond to those corrective work orders that had not yet been addressed, as of October 3, 2025.
- b) Please refer to Liberty’s responses to Question 4 and Question 5 of this set of data requests.
- c) Please refer to Liberty’s responses to Question 4 and Question 5 of this set of data requests.
- d) Liberty understands that these four labels were used to indicate updates to the required repairs associated with an asset location. Liberty understands that the label “GIS Confirmed” was used to indicate that a pole replacement was confirmed complete using information contained within Liberty’s GIS database. Liberty understands the labels “Asset Tracking Pass,” “Asset Tracking,” and “Asset Tracking priority 3” were used to indicate that repair updates to a corresponding asset location were being tracked in Liberty’s asset tracking application.
- e) Liberty understands the “repair_date” field to contain information on when a repair was made at the corresponding asset location. Liberty understands the “construction_completion_date” field to contain information on when construction of a new pole was completed at the corresponding asset location.
- f) Liberty understands that the “construction_completion_date” field could be blank for various reasons, such as where no need for pole replacement was identified, where the

pole replacement had not yet been completed, or where data regarding the pole replacement date was not entered in this particular field after completion.

g) The three unique values in the “construction_completion_date” field correspond to three dates on which pole replacement work took place. 44356 corresponded to June 9, 2021; 44723 corresponded to June 11, 2022; and 44846 corresponded to October 12, 2022. These values were displayed as generic numbers in the spreadsheet due to incorrect cell formatting for that column. The information presented in this column should display correctly as dates if the “Date” option is selected under “Format Cells.” While Liberty understands that these are not the only three dates on which pole replacement work took place on the Topaz Circuit, these are the only three that were entered under the “construction_completion_date” column.

h) Please refer to Liberty’s response to CalAdvocates-LIB-A2506017-031, Question 3 and to Question 7 of this set of data requests and Liberty’s amended response to CalAdvocates-LIB-A2506017-001, Question 2. As described in those responses, there are multiple rows corresponding to the same Fulcrum ID and reflecting different versions in the event history associated with that Fulcrum ID. Thus, some rows in which the “pole_replacement” and “pole_replaced” columns are blank but where the correction code calls for a pole replacement correspond to versions of a Fulcrum ID’s event history prior to the pole replacement having been completed. For rows that reflect the most recent versions of a Fulcrum ID’s event history where the “pole_replacement” and “pole_replaced” columns are blank or but where the correction code calls for a pole replacement, Liberty understands that information regarding completed pole replacements was sometimes recorded in fields other than the “pole_replacement” and “pole_replaced”. For example, row 9 (corresponding to pole number 266603) shows a repair completion date of 6/18/2025. This repair was a pole replacement, though no information was entered in the “pole_replacement” or “pole_replaced” columns for that asset location. A small number of such rows may also correspond to asset locations where pole replacements had not yet been completed as of October 3, 2025, when the inspection data in *CONFIDENTIAL-CalAdvocates-LIB-A2506017-31-Q3.csv* and *CONFIDENTIAL - CalAdvocates-LIB-A2506017-001-Q2_Amended* was extracted from Fulcrum.

Attachment 4

**Response to data request CalAdvocates-
LIB-A2506017-042,
question 4, December 31, 2025**



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

December 31, 2025

Liberty Utilities (CalPeco Electric) LLC

A.25-06-017
WEMA

The Public Advocates Office

Data Request No.: CalAdvocates-LIB-A2506017-042

Requesting Party: Public Advocates Office

Originator: Charles Madison, Charles.Madison@cpuc.ca.gov
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Date Received: December 16, 2025

Due Date: December 31, 2025

Attachments to these responses contain information marked confidential in accordance with applicable law and regulation. The basis for confidentiality is set forth in accompanying confidentiality declaration. Public disclosure is restricted.

The following questions relate to the ignition event referenced in Liberty's response to CalAdvocates-LIB-A2506017-031 (Amended), Question 6(b), including Liberty's statement that "the occurrence of an ignition event on the Topaz 1261 Circuit" contributed to its decision to pursue the Topaz 1261 Rebuild Project.

REQUEST NO. 1:

Identify the “ignition event on the Topaz 1261 Circuit” referenced in Liberty’s data request response.

- a) State the exact date and time of the ignition event.
- b) Identify the specific location, including structure numbers, pole numbers, or GPS coordinates.
- c) Describe the physical cause of the ignition as determined at the time by Liberty.
- d) To the extent that Liberty is aware, describe the physical cause(s) of the ignition as determined at the time by any entity other than Liberty. For example, this may include local fire departments, newspapers, California Department of Forestry and Fire Protection (CAL FIRE), CPUC Safety and Enforcement Division, United States Forest Service, public interest groups, or other sources.
- e) State whether the ignition involved Liberty-owned equipment and, if so, identify the equipment.
- f) Identify whether the ignition resulted in fire spread, smoke, charring, or any suppression activity.

RESPONSE:

This response contains confidential attachments. Subject to and without waiving its objections, Liberty responds as follows:

- a) Based on Liberty's records, the ignition occurred on May 3, 2014 at approximately 7:45am. Please refer to attachment *CalAdvocates-LIB-A2506017-001-Q10.xlsx*, attached to Liberty's amended response to CalAdvocates-LIB-A2506017-001, Question 10.
- b) Please refer to attachment *CalAdvocates-LIB-A2506017-001-Q10.xlsx*, attached to Liberty's amended response to CalAdvocates-LIB-A2506017-001, Question 10.
- c) Please refer to attachment *CalAdvocates-LIB-A2506017-001-Q10.xlsx*, attached to Liberty's amended response to CalAdvocates-LIB-A2506017-001, Question 10.
- d) Based on a reasonable search and diligent inquiry of publicly available information, Liberty has not identified a report documenting the cause of ignition by the United States Forest Service, Bureau of Land Management, Cal Fire, or Antelope Valley Fire Protection District, which are the public fire agencies having jurisdiction over land in the Walker and Coleville area.
- e) Based on Liberty's records, the ignition involved vegetation contact with a crossarm and conductor owned by Liberty. See confidential attachment *CONFIDENTIAL-Topaz1261_5.3.14*.
- f) Based on Liberty's records, the fire was contained to a size of less than 0.25 acres and was suppressed by the Antelope Valley Volunteer Fire Department. See confidential attachment *CONFIDENTIAL-Topaz1261_5.3.14*.

REQUEST NO. 2:

State when Liberty first became aware of the ignition event and describe how that awareness was documented (e.g., internal reports, emails, work orders, incident logs).

RESPONSE:

This response contains confidential attachments. Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty is not aware of the exact time when it first became aware of the ignition event due to the passage of time. Liberty has located an internal fire incident report that it understands

would have been completed by Liberty personnel shortly after the ignition event. See confidential attachment *CONFIDENTIAL-Topaz1261_5.3.14*.

REQUEST NO. 3:

Describe how the ignition event was classified internally at the time it occurred.

- a) Identify the classification category applied (e.g., ignition, near-miss, non-reportable event).
- b) Identify the criteria or policy used to assign that classification.
- c) State who made the classification decision and their role.
- d) Describe whether the classification was reviewed or approved by any supervisor or committee.
- e) State whether the classification has ever been changed, revised, or reconsidered and, if so, identify the new classification category applied, and when and why it was changed.

RESPONSE:

This response contains confidential attachments. Liberty objects to this Question as vague and ambiguous and Liberty does not understand this Question as framed, including the references to “classification,” “criteria,” and “policy.” Subject to and without waiving its objections, Liberty responds as follows:

- a) Based on Liberty’s records, Liberty described this ignition as a “fire incident.” See confidential attachment *CONFIDENTIAL-Topaz1261_5.3.14*. As described below, Liberty is not subject to the formal ignition reporting requirements set forth in Decision 14-02-015.
- b) See response to subpart (a).
- c) Please refer to confidential attachment *CONFIDENTIAL-Topaz1261_5.3.14* for the name of the employee who completed the internal fire incident report.
- d) Due to the passage of time, Liberty is not aware of information indicating whether the fire incident report was reviewed or approved by employees other than the individual who completed the report.
- e) Liberty understands that the description of this ignition as a “fire incident” has not been changed or revised.

REQUEST NO. 4:

- a) Identify all internal documents created in connection with the ignition event, including incident reports, investigation summaries, engineering assessments, or management briefings.
- b) Provide copies of any documentation in support of your response to subpart (a).

RESPONSE:

This response contains confidential attachments. Liberty objects to this Question as vague, ambiguous and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows:

- a) Liberty has located an internal fire incident report that it understands would have been completed by Liberty personnel shortly after the ignition event. See confidential attachment *CONFIDENTIAL-Topaz1261_5.3.14*.
- b) Please refer to Liberty's response to subpart (a).

REQUEST NO. 5:

Liberty stated that it was “not aware of any ignitions associated with the Topaz 1261 Circuit prior to November 17, 2020,”¹ but later asserted that “the occurrence of an ignition event on the Topaz 1261 Circuit contributed to its decision to pursue the Topaz 1261 Rebuild Project.²

Explain why the ignition event was not disclosed in earlier responses regarding prior ignitions.

- a) State whether Liberty considered the ignition event responsive to the data request at the time.
- b) If Liberty had not considered the ignition event responsive to the data request at the time, explain the basis for concluding it was not responsive.
- c) State when Liberty first recognized the inconsistency between its prior statements and its 2019 General Rate Case (GRC).
- d) Identify any steps taken to correct, supplement, or clarify prior disclosures

RESPONSE:

This response contains confidential attachments. Liberty objects to this Question as vague and ambiguous as framed. Liberty further objects to this Question as assuming facts. Subject to and without waiving its objections, Liberty responds as follows:

- a) In connection with its original response to CalAdvocates-LIB-A2506017-001, Question 10, Liberty conducted a reasonable and diligent search using its current database of ignitions in Fulcrum, which at the time did not include records of any ignition associated with the Topaz 1261 Circuit prior to November 17, 2020. In the process of responding to additional data requests in October 2025 and following a meet and confer with Cal Advocates regarding its prior responses, Liberty subsequently became aware of a data error in its Fulcrum database of ignitions based on a reference to an ignition event on the Topaz Circuit in its 2019 GRC testimony, which had been tagged with an incorrect location and therefore associated with a different circuit in Liberty's Fulcrum database. Liberty has since updated the event record associated with the May 3, 2014 ignition in its database. See confidential attachments *CONFIDENTIAL-May 3, 2014 Ignition Event (Original Fulcrum Record).csv* and *CONFIDENTIAL-May 3, 2014 Ignition Event (Updated Fulcrum Record).pdf*.
- b) See Liberty's response to subpart (a).
- c) See Liberty's response to subpart (a).
- d) Liberty disclosed information related to the May 3, 2014 ignition event on the Topaz Circuit in its amended response to CalAdvocates-LIB-A2506017-001, Question 10, served on December 9, 2025.

¹ Liberty's response to data request CalAdvocates-LIB-A2506017-001, question 10, September 10, 2025.

² Liberty's response to data request CalAdvocates-LIB-A2506017-031, question 6, December 9, 2025.

REQUEST NO. 6:

State whether Liberty contends that the ignition event mentioned in its 2019 GRC is the same as, related to, or different from any ignition discussed in later filings or testimony, including in the 2019 GRC, in A.25-06-017, or in any other proceeding.

RESPONSE:

Liberty objects to this Question as vague and ambiguous and Liberty does not understand this Question as framed. Subject to and without waiving its objections, Liberty responds as follows: Based on Liberty's records, Liberty believes the May 3, 2014 fire incident on the Topaz Circuit which Liberty identified in its amended response to CalAdvocates-LIB-A2506017-001, Question 10 is the ignition event referenced in its 2019 GRC testimony, Ex. *Liberty-02: Capital* (at p. 9).

REQUEST NO. 7:

Identify whether the ignition event influenced any operational decisions other than the Topaz 1261 Rebuild Project, including inspection frequency, repair prioritization, or risk scoring.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: As explained in Liberty's 2019 GRC, the historical ignition event on the Topaz Circuit informed Liberty's decision to pursue the Topaz 1261 Rebuild Project. Due to the passage of time, Liberty is not aware of other specific actions taken in direct response to the ignition event referenced in the 2019 GRC testimony.

REQUEST NO. 8:

State whether Liberty disclosed the ignition event to any regulatory agency, insurer, or third party and, if so, identify when and to whom.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Due to the passage of time, and the small size of the ignition (less than 0.25 acres), Liberty is not aware of whether and to what extent it identified the ignition event to regulators, insurers, or other third parties. As described below, Liberty is not subject to the formal ignition reporting requirements set forth in Decision 14-02-015.

REQUEST NO. 9:

If Liberty contends the ignition event was not reportable under Commission Decision (D.)14-02-015, explain how that determination was made.

- a) Identify the specific provision(s) of D.14-02-015 relied upon.
- b) Describe any analysis, memorandum, or checklist used in making that determination.
- c) State whether the determination was documented in writing.
- d) Identify whether the determination was ever reviewed by legal, regulatory, or compliance personnel.

e) Provide copies of any documentation to support your answers on subpart (a) – (e).

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and assuming facts. Liberty further objects to this Question to the extent it seeks information protected by the attorney-client privilege, attorney work product doctrine, and/or other privileges. Subject to and without waiving its objections, Liberty responds as follows: Liberty is not subject to the formal ignition reporting requirements set forth in Decision 14-02-015.

- a) See Ordering Paragraphs 8 and 9 of D.14-02-015, requiring only Pacific Gas & Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) to collect and report ignitions to the Commission pursuant to the formal reporting requirements adopted in that decision.
- b) See Liberty's response to subpart (a).
- c) See Liberty's response to subpart (a).
- d) See Liberty's response to subpart (a).
- e) See Liberty's response to subpart (a).