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Exhibit Number	:	CA-07
Commissioner	:	M. Baker
Admin Law Judge	:	R. Haga
Witness	:	C. Madison

PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

TESTIMONY ON OPERATIONS FOR MOUNTAIN VIEW FIRE COST-RECOVERY APPLICATION

Reasonableness of Operations Prior to Ignitions

San Francisco, California
December 12, 2025

590552475

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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 (A.) 25-06-017).

This exhibit presents the analyses of the Public Advocates Office (Cal Advocates) regarding the reasonableness of Liberty's practices and operations.

This exhibit relates specifically to Exhibit Liberty-03, Liberty's testimony on prudence of operations.[1]

II. LIBERTY LACKS DOCUMENTATION VERIFYING RECORD REVIEW AND RISK ASSESSMENT FOR THE TOPAZ 1261 CIRCUIT

A. Liberty Assumed Control of the Topaz 1261 Circuit without Documenting any Review of NV Energy's Asset Records.

Liberty began providing electric service to California in 2011 when it purchased and assumed control of the utility system from NV Energy. Liberty now serves approximately 50,000 customers in the Lake Tahoe region of northern California. Liberty's electric assets consist of 672 miles of primary overhead distribution lines and 33 miles of overhead transmission lines.[2]

Liberty states that it is in possession of "some inspection and maintenance records" from prior to the time of acquisition, which includes documentation "dating back to approximately 2008 and some engineering records dating back to the 1970s."[3] However, Liberty could produce no documentation to verify that these records or any

[1] Attachment 1, Exhibit (Ex.) Liberty-03, at 1.

[2] Attachment 1, Ex. Liberty-03, at 1.

[3] Attachment 2, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 1, November 1, 2025.

others were examined as part of an initial due diligence process while assuming control of the Topaz 1261 circuit.[4]

Although Liberty claims possession of some inspection and maintenance documentation at the time of purchasing NV Energy's assets, it failed to demonstrate that a full records review had been performed at the time.[5] The few examples provided do not adequately confirm that Liberty meaningfully reviewed all acquired asset records.[6,7]

This partial response furnishes no comprehensive evidence that Liberty evaluated the accuracy or completeness of NV Energy's records for the Topaz 1261 circuit at the time of acquisition. Liberty fails to clearly state whether a records review was performed.[8,9]

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[4] Attachment 2, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 1, November 1, 2025.

[5] Attachment 3, Response to data request CalAdvocates-LIB-A2506017-031, question 1, October 31, 2025.

[6] Liberty has located additional records after the second data request. Cal Advocates finds that is inadequate.

[7] Attachment 3, Response to data request CalAdvocates-LIB-A2506017-31, question 1, October 31, 2025.

> Liberty obtained asset condition records from NV Energy as part of the transaction. Liberty is in possession of some asset condition records from prior to the time of acquisition. For example, Liberty has located intrusive inspection results from 2010, see confidential attachment CONFIDENTIAL-2010 Intrusive Pole Inspection Data.xlsx, and annual GO 165 reports for 2006-2010, see attachment 2006-2010 GO 165 Annual Reports.pdf. Liberty is continuing to search for pre-acquisition records related to the Topaz 1261 Circuit and will update this response to the extent identified.

[8] Attachment 2, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 1, November 1, 2025.

> As part of the transaction, there was an exchange of information related to Sierra Pacific's assets, and CalPeco's acquisition of the utility included files, documents, and papers related to the utility's business and the assets being purchased. In addition, on a going forward basis, the two utilities agreed to provide each other reasonable access to their properties to permit inspection of the integrated systems, to perform any relevant work, and to all data, including maintenance records, with respect to the operation and maintenance of each utility's respective portions of the integrated electric systems.

[9] Attachment 3, Response to data request CalAdvocates-LIB-A2506017-031, question 1, October 31, 2025. After an additional request for clarification, Liberty stated it, "has not identified specific records and information that it understands to be responsive to this request given the passage of time."

Liberty therefore has not shown that it had comprehensive knowledge or understanding of the state of the system it had acquired, nor that it had knowledge of any potential fire risks present on the Topaz 1261 Circuit.

B. Liberty Operated the Topaz 1261 Circuit without Assessing any Inherited Ignition Risks or Hazards.

Liberty failed to furnish documentation showing that it evaluated acquired asset conditions, confirmed past mitigations were completed, or reviewed hazard history prior to operating the circuit during multiple wildfire seasons.[10]

Operating the Topaz 1261 circuit without first confirming the condition of its infrastructure, particularly in a high fire risk and extreme wind area, endangered public safety because Liberty lacked reasonable assurance of the integrity of its system.[11]

In fact, Liberty was not able to show that it performed a systematic and comprehensive review of the assets on the Topaz 1261 circuit at any point between its assumption of control in 2011 and when it performed a comprehensive asset survey between April and August 2020. The absence of this documentation diminishes Liberty's ability to claim that it reasonably operated and managed its electric assets.

III. LIBERTY FAILED TO TAKE URGENT CORRECTIVE ACTIONS ON TOPAZ 1261.

A. The Topaz 1261 Circuit Operated in High Fire Risk Conditions That Required Increased Patrol Inspections.

Liberty's Topaz 1261 circuit was located in a designated Tier 2 High Fire Threat District (HFTD) and was exposed to persistent high winds, both of which significantly elevated the potential for wildfire ignition.[12,13] These environmental factors were well

[10] Attachment 4, Response (amended) to data request CalAdvocates-LIB-A2506017-015, questions 2-3, November 1, 2025.

[11] California Public Utilities Commission, General Order No. 165, *Inspection Requirements For Electric Distribution and Transmission Facilities,* Rule III.B, January 2020. "Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation."

[12] Attachment 1, Ex. Liberty-03 at 1.

[13] Attachment 1, Ex. Liberty-03 at 11.

known and historical, and they created conditions where immediate corrective action, such as pole replacement, increased patrol inspections, and ignition risk mitigations were essential.

Ignition risk mitigations generally involve taking prompt corrective actions to address conditions that pose a serious threat to public safety, and circuit reliability. For Liberty, this means more annual patrol inspections and ensuring they are conducted without delay as opposed to them being conducted every two years in Tier 2 HFTD areas. More frequent annual patrol inspections increase the likelihood of finding hazards and correcting them before uncorrected hazards become outages or ignition related incidents. If Liberty accelerated its patrol inspection frequency it would demonstrate a proactive commitment to protecting the public and its infrastructure from preventable risk.[14],[15]

Instead of urgently acting to address these risks, Liberty continued operating the Topaz 1261 circuit as though it were not subject to higher risk environmental factors.[16]

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[14] Attachment 5, PG&E, 2019 Wildfire Mitigation Plan, February 9, 2019 (PG&E 2019 WMP), at 4.

> Key objectives identified by PG&E in its 2019 WMP include proposals for conducting enhanced safety inspections of utility assets in HFTD areas, hardening its electric system against wildfires by installing stronger, more resilient poles and covered power lines, expanding PG&E's vegetation management around its power lines, including clearing overhanging branches directly above and around power lines, and increasing situational awareness.

[15] Attachment 6, SDG&E, 2019 Wildfire Mitigation Plan, February 9, 2019 (SDG&E 2019 WMP), at 25.

> SDG&E is required to inspect its electric distribution system according to Commission GO 165. GO 165 establishes inspection cycles and record-keeping requirements for utility distribution equipment. In general, utilities must patrol their systems once a year in urban areas and HFTD Tier 2 and Tier 3. Patrols in rural areas outside of HFTD Tier 2 and Tier 3 are required to be performed once every two years. SDG&E, however, exceeds the basic requirements and performs patrols in all areas on an annual basis. In addition to the patrols, utilities must conduct detailed inspections at a minimum every 3-5 years, depending on the type of equipment.

[16] Attachment 7, Liberty, 2019 Wildfire Mitigation Plan, February 9, 2019 (Liberty 2019 WMP), at 21.

> This area frequently experiences hazardous weather conditions such as high winds and below freezing temperatures. This paired with the deterioration of the infrastructure has resulted in higher risk of improper wire sag along with conductors breaking under ice and snow strain.

B. Topaz 1261's History of Unreliable Operation Demonstrated the Need for Swift Intervention.

Table 1 below provides a snapshot of how often the Topaz 1261 circuit ranked in Liberty's annual reliability reports from 2015 to 2024. The key indicator shown, named SAIDI, which stands for System Average Interruption Duration Index, is equal to the total number of minutes the average customer on that circuit was without electricity each year. Higher numbers mean more frequent or longer outages, and lower numbers mean better reliability.

Table 1:[17]
Annual Reliability Ranking of the Topaz Circuit

Year	Rank	Circuit SAIDI
2015[18]	1	3,003
2016[19]	1	1,338
2017[20]	-[21]	2,699
2018[22]	2	2,722
2019[23]	1	3,040
2020[24]	1	2,016
2021[25]	1	3,029
2022[26]	1	2,313
2023[27]	1	1,925
2024[28]	1	370

[17] Table 1 created by referencing each Liberty Annual Reliability Report from 2015 to 2024.

[18] Attachment 8, Liberty Utilities 2015 Annual Reliability Report at 21.

[19] Attachment 9, Liberty Utilities 2016 Annual Reliability Report at 21.

[20] Attachment 10, Response to data request CalPA-Liberty-R1810007-002, question 5, February 27, 2019. "The WMP incorrectly stated Topaz line 1261 as a worst performing line in 2017. The Topaz line 1261 was the worst performing circuit in 2015 and 2016."

[21] Attachment 10, Response to data request CalPA-Liberty-R1810007-002, question 5, February 27, 2019. Annual reports only describe the top and second most worst performing circuit. Two other circuits occupied the top and second spot. "The 201 and 7202 circuits surpassed the Topaz line 1261 line in 2017 due to the severe winter storms experienced in the Lake area, which did not impact the Topaz line 1261 as severely."

[22] Attachment 11, Liberty Utilities 2018 Annual Reliability Report at 21.

[23] Attachment 12, Liberty Utilities 2019 Annual Reliability Report at 21.

[24] Attachment 13, Liberty Utilities 2020 Annual Reliability Report at 21.

[25] Attachment 14, Liberty Utilities 2021 Annual Reliability Report at 21.

[26] Attachment 15, Liberty Utilities 2022 Annual Reliability Report at 22.

[27] Attachment 16, Liberty Utilities 2023 Annual Reliability Report at 21. Liberty changed the Topaz 1261 Circuit ID to Topaz 1202.

[28] Attachment 17, Liberty Utilities 2024 Annual Reliability Report at 22. Liberty changed the Topaz 1261 Circuit ID to Topaz 1202.

Looking across the table, Topaz 1261 repeatedly shows very high SAIDI values and top rankings for worst performance. In several of these years, it was ranked the single worst or the second worst circuits in Liberty's entire system. For the last ten reliability reports, Topaz 1261 was the worst performing circuit eight times out of ten.

Although Liberty's 2019 Wildfire Mitigation Plan incorrectly asserted that Topaz 1261 was the number one worst performer in 2017, in reality it had been surpassed by circuits 201 and 7202 due to extraordinary winter storm impacts in the Tahoe Lake region.[29] This shift in ranking reflected regional weather effects rather than any improvement in Topaz 1261's condition or performance.[30]

The table shows a long and constant pattern of serious reliability problems, year after year. This persistence signals that Topaz 1261 was not just having occasional bad years, it was a chronically unreliable circuit, with conditions that made equipment failures more likely and therefore increased the risk of electrical ignition.[31]

The circuit's continuous presence at or near the top of Liberty's annual reliability rankings demonstrates that its poor condition was well known, established and documented within the company's own annual reliability reporting.

Despite that, Liberty continued to rely on biennial patrol inspections, failing to address the conditions on a circuit that had shown persistent, well established reliability deficiencies and elevated ignition risk.[32]

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[29] Attachment 10, Response to data request CalPA-Liberty-R1810007-002, question 5, February 27, 2019. "The WMP incorrectly stated Topaz line 1261 as a worst performing line in 2017. The Topaz line 1261 was the worst performing circuit in 2015 and 2016."

[30] Attachment 10, Response to data request CalPA-Liberty-R1810007-002, question 5, February 27, 2019. "The 201 and 7202 circuits surpassed the Topaz line 1261 line in 2017 due to the severe winter storms experienced in the Lake area, which did not impact the Topaz line1261 as severely."

[31] Attachment 9, Liberty Utilities 2016 Annual Reliability Report at 22. "The 1261 circuit experienced high circuit SAIDI in 2016 due to multiple circuit lockouts, wire slapping during windy conditions, and loss of supply."

[32] Attachment 18, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 4, November 1, 2025. Liberty furnished patrol inspection records for calendar years 2013, 2015, and 2017. These records demonstrate that inspections were historically scheduled and conducted on a two-year cycle.

At the time, other California utilities were increasing inspection frequencies, expanding detailed equipment assessments, and adopting more aggressive mitigation practices in response to growing wildfire threats. Liberty's decision to maintain only biennial patrol inspections placed it out of step with evolving industry best practices -and left known problems on Topaz 1261 uncorrected.[33],[34]

C. Industry Standards Made Clear That High Wind HFTD Circuits Required Prompt Wildfire Mitigation Measures.

By 2017–2019, it was widely recognized throughout the California utility industry that circuits experiencing high wind conditions located in HFTDs posed an elevated ignition hazard.[35] California utilities were already implementing system hardening measures, covered conductors, stronger poles, rapid fault detection technology, and public safety power shutoff (PSPS) practices to reduce ignition risk in these conditions.[36] Even in light of this recognized consensus, Liberty failed to take critical and urgent

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[33] Attachment 5, PG&E, 2019 Wildfire Mitigation Plan, February 9, 2019 (PG&E 2019 WMP), at 4.

> Key objectives identified by PG&E in its 2019 WMP include proposals for conducting enhanced safety inspections of utility assets in HFTD areas, hardening its electric system against wildfires by installing stronger, more resilient poles and covered power lines, expanding PG&E's vegetation management around its power lines, including clearing overhanging branches directly above and around power lines, and increasing situational awareness.

[34] Attachment 6, SDG&E, 2019 Wildfire Mitigation Plan, February 9, 2019 (SDG&E 2019 WMP), at 25.

> SDG&E is required to inspect its electric distribution system according to Commission GO 165. GO 165 establishes inspection cycles and record-keeping requirements for utility distribution equipment. In general, utilities must patrol their systems once a year in urban areas and HFTD Tier 2 and Tier 3. Patrols in rural areas outside of HFTD Tier 2 and Tier 3 are required to be performed once every two years. SDG&E, however, exceeds the basic requirements and performs patrols in all areas on an annual basis. In addition to the patrols, utilities must conduct detailed inspections at a minimum every 3-5 years, depending on the type of equipment.

[35] Major wildfire events such as the 2017 Fire Siege, 2018 Camp Fire, and 2019 Kincade Fire had already made it public and industry consensus that wind-driven conductor contact, or vegetation contact increased the probability of a critical ignition.

[36] By 2019, all California investor-owned utilities had filed Wildfire Mitigation Plans (WMPs). These plans consistently acknowledged that high-wind events in HFTDs greatly increased ignition likelihood and therefore required targeted mitigation, including covered conductor, stronger poles, rapid fault detection, and PSPS.

corrective actions on Topaz 1261, leaving the circuit vulnerable to well understood ignition risk factors.[37]

D. Liberty's Infrastructure and Planning Decisions Allowed Known Hazards to Persist without Urgent Remediation.

Although Liberty acknowledged its aging infrastructure in regulatory filings, it did not take timely or proactive steps to address the elevated risks associated with the Topaz 1261 circuit.[38]

Additionally, Liberty maintained no records indicating that any interim risk mitigation measures were put in place for the Topaz 1261 circuit. Despite conditions that warranted heightened monitoring and protective actions, Liberty neither documented nor demonstrated efforts to manage the circuit's increased risk profile. As a result, Liberty allowed the circuit to remain in service without the safeguards typically expected for equipment operating under elevated threat conditions.[39]

[37] Attachment 19, Response to data request CalAdvocates-LIB-A2506017-031, question 6, October 31, 2025.

> As stated in Liberty's 2019 GRC, filed in December 2018 (A-18-12-001), Liberty had been working diligently to replace its aging infrastructure since purchasing the utility from NV Energy in 2011, including the re-conductoring of old lines to enhance safety and reliability.

[38] Attachment 19, Response to data request CalAdvocates-LIB-A2506017-031, question 6, October 31, 2025. While Liberty states that it had been replacing its aging infrastructure since 2011, the Topaz 1261 Circuit reconductor project did not begin construction until 2019.

[39] Attachment 20, Response to data request CalAdvocates-LIB-A2506017-031, question 4, October 24, 2025. "Liberty is also not aware of records formally tracking interim risk controls associated with due-date extensions on the Topaz 1261 Circuit in the specified time frame."

E. Liberty Continued Operating an Unreliable Circuit in a High Wind HFTD.

1. Industry Standards Called for Enhanced Mitigation

In the years leading up to the Mountain View Fire, utilities were expected to harden and modernize equipment in HFTDs, as well as adjust operational procedures to account for severe weather.[40]

Typical best practices included:

- System hardening, particularly in high wind areas;
- Enhanced vegetation management to avoid contact with energized lines;
- Operational protocols, including weather triggered patrols or shutoffs; and
- Policy for reassessment of circuit risk, especially in HFTDs.[41],[42]

These bet practices formed a clear standard of care for circuits operating in high wind HFTDs. For an unreliable circuit like Topaz 1261 situated in an area with persistent high wind exposure, enhanced mitigation was necessary. In light of this clear standard of care, Liberty still did not implement any of the items listed above prior to the Mountain View Fire.

2. Patrol Inspections and Delayed Maintenance Fell Short of Required Safety Measures

As a rural overhead distribution circuit, Topaz 1261 was required to receive patrol inspections at least once every two years, with each patrol designed to identify obvious equipment defects, hardware deterioration, conductor issues, or visible vegetation

[40] By 2019, all California investor-owned utilities filed WMPs. These plans consistently acknowledged that high-wind events in HFTDs greatly increased ignition likelihood and therefore required targeted mitigation, including covered conductor, stronger poles, rapid fault detection, and PSPS.

[41] Attachment 5, PG&E 2019 WMP, at 3-4.

[42] Attachment 6, SDG&E 2019 WMP, at 30 – 40.

hazards.[43] General Order 165 further required Liberty to document any deficiencies observed during these patrols and create work orders to ensure timely corrective action.[44]

Even in light of these widely recognized standards, Liberty maintained a pattern of two-year patrol inspections on the Topaz 1261 circuit.[45] This reveals that Liberty failed to respond to the Topaz 1261 circuit's ignition risk as high wind conditions persisted.

Instead of implementing ignition risk mitigations, Liberty relied on standard patrol inspection intervals that were inadequate for the known ignition risk factors. Liberty's patrol inspections in 2013, 2015, and 2017 identified no corrective work on the circuit, even though it consistently appeared at the top of Liberty's list of unreliable circuits.[46] According to Liberty, "after a reasonable search and diligent inquiry, the Topaz 1261 maps used for Liberty's patrols… do not indicate any corrective work identified by those patrols."[47]

This is an important gap between the minimum inspection standards in General Order (GO) 165, and the elevated ignition risk factors on Topaz 1261, which would have been best addressed through increased patrols, enhanced vegetation management, and

[43] California Public Utilities Commission, General Order No. 165 (GO 165), Inspection Requirements For Electric Distribution and Transmission Facilities, Table 1, January 2020. Rural overhead distribution must be patrolled every two years.

[44] GO 165, Rule III, Section C.

[45] Attachment 18, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 4, November 1, 2025. Liberty located patrol inspection records for calendar years 2013, 2015, and 2017. These records demonstrate that inspections were historically scheduled and conducted on a two-year cycle.

[46] Liberty's patrols revealed no corrective work for three patrol inspections, yet this circuit was repeatedly at the top of Liberty's list of unreliable circuits.

[47] Attachment 1, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 1, November 1, 2025. "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."

other ignition risk mitigations.[48] [49] In fact, as discussed below, Liberty was unable to substantiate even that it met the minimum GO 165 mandated patrols.

IV. LIBERTY'S FAILURE TO TAKE URGENT CORRECTIVE ACTIONS ON TOPAZ 1261 CREATED A PREDICTABLE WILDFIRE IGNITION HAZARD

A. Historical Patrol Inspection Practices and Recordkeeping Gaps

Liberty's inability to produce documentation showing that required patrol inspections were performed between 2017 and 2020 represents a significant departure from reasonable utility practice and from the expectations established under GO 165.[50]

Patrol inspections are a fundamental safety activity required of an electric utility. Patrol inspections are intended to identify visible defects, deteriorated components, vegetation encroachments, and other readily observable hazards that, if left unaddressed, can lead to equipment failure or wildfire ignition.[51] Maintaining complete and consistent

[48] Attachment 5, PG&E 2019 WMP, at 5 - 10. PG&E describes how it changed strategy to address the risks of utility caused wildfires.

[49] Attachment 6, SDG&E 2019 WMP, at 30 – 40. SDG&E describes how it changed strategy to address the risks of utility caused wildfires.

[50] Attachment 18, Response to data request CalAdvocates-LIB-A2506017-015, question 4, November 1, 2025. "Liberty has not located further documentation of patrols of Topaz 1261 Circuit between November 2017 and the 2020 detailed inspection."

[51] GO 165, Section III Distribution Facilities – Definitions. ""Patrol inspection" shall be defined as a simple visual inspection, of applicable utility equipment and structures, that is designed to identify obvious structural problems and hazards."

documentation is therefore essential.[52] Without reliable records, Liberty cannot demonstrate that circuit conditions were being monitored in accordance with GO 165.[53]

The absence of patrol inspection records has operational and managerial implications. Without documentation, it is impossible to determine whether Liberty failed to conduct required patrols, performed patrols but failed to record them, or created records that were later misplaced or lost.[54] Each of these scenarios reflects a breakdown in Liberty's internal controls, oversight mechanisms, and safety management systems. If Liberty cannot substantiate that patrol inspections occurred, it likewise cannot demonstrate that it fulfilled its GO 165 obligations or that it engaged in proactive hazard identification and mitigation in the years leading up to the Mountain View Fire.

V. LIBERTY ALLOWED CONDITIONS TO DEVELOP THAT FACILITATED IGNITION

A. Widespread Defects and Failing Infrastructure

In Starting in April 2020 and concluding in August 2020, Liberty conducted a system wide asset survey in which Liberty's journeyman linemen, together with an outside contractor, conducted "an asset survey and detailed inspection of all overhead distribution and transmission assets."[55]

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[52] GO 165, Section III C.

> The utility shall maintain records for (1) at least ten (10) years of patrol and detailed inspection activities, and (2) the life of the pole for intrusive inspection activities. Such records shall be made available to parties or pursuant to Commission rules upon 30 days notice. Commission staff shall be permitted to inspect such records consistent with Public Utilities Code Section 314 (a).
>
> For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.

[53] GO 165, Section III C.

[54] Attachment 21,Response (amended) to data request CalAdvocates-LIB-A2506017-031, question 2, October 24, 2025.

[55] Attachment 1, Ex. Liberty – 03, at 23.

This survey consisted of detailed visual inspections of the condition of conductors, poles, and other overhead equipment, performed "regardless of when the equipment had last been inspected."[56]

In the 2020 Asset Survey, crews conducted 1,352 detailed inspections on the Topaz 1261 circuit, and only 59% of those assets received a passing grade.[57],[58] This means that 41% of the inspections on the Topaz circuit failed to meet Liberty's own condition standards. This substantial proportion reflects widespread equipment degradation. An inspection resulting in a "pass" indicated that the structure exhibited no immediate or near-term GO 95 compliance issues, no structural integrity concerns, and no observable defects likely to contribute to reliability problems or ignition risk. In contrast, assets that did not pass were flagged for follow up action, ranging from repairs, structural reinforcement or pole replacement.[59]

Even more revealing, (100) of the Topaz inspections resulted in recommendations for full pole replacement, underscoring how frequently inspectors encountered infrastructure that had reached the end of its structural life.[60]

It should be noted that, this asset survey occurred after a three year period during which Liberty is unable to show it conducted inspections on the Topaz 1261 Circuit.[61]

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[56] Attachment 1, Ex. Liberty – 03, at 23.

[57] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025. There are 1,352 records of inspection listed in the file. The passing value is the count of "pass" inspections and divided by total inspections.

[58] A detailed inspections is a comprehensive visual and diagnostic assessment with conditions noted.

[59] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025. Column O contains condition codes indicating the follow up corrective action. The codes range from Guys/Guards Broken/Loose to Pole Replacement.

[60] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025. The value is a count of rows that have "Pole Needs Replaced" in the condition codes column.

[61] Attachment 18, Response to data request CalAdvocates-LIB-A2506017-015, question 4, November 1, 2025. "Liberty has not located further documentation of patrols of Topaz 1261 Circuit between November 2017 and the 2020 detailed inspection."

Earlier and more diligent inspection may have identified these critical infrastructure issues and allowed Liberty to address them in a timely manner.

B. Structural Defects That Indicated Systemwide Weakness

The condition code data makes the pattern unmistakable. Figure 1 shows the conditions identified on Topaz 1261 circuit during its 2020 Asset Survey, organized from most to least common.

Figure 1:[62]
Results of 2020 Asset Survey: Topaz 1261 Circuit

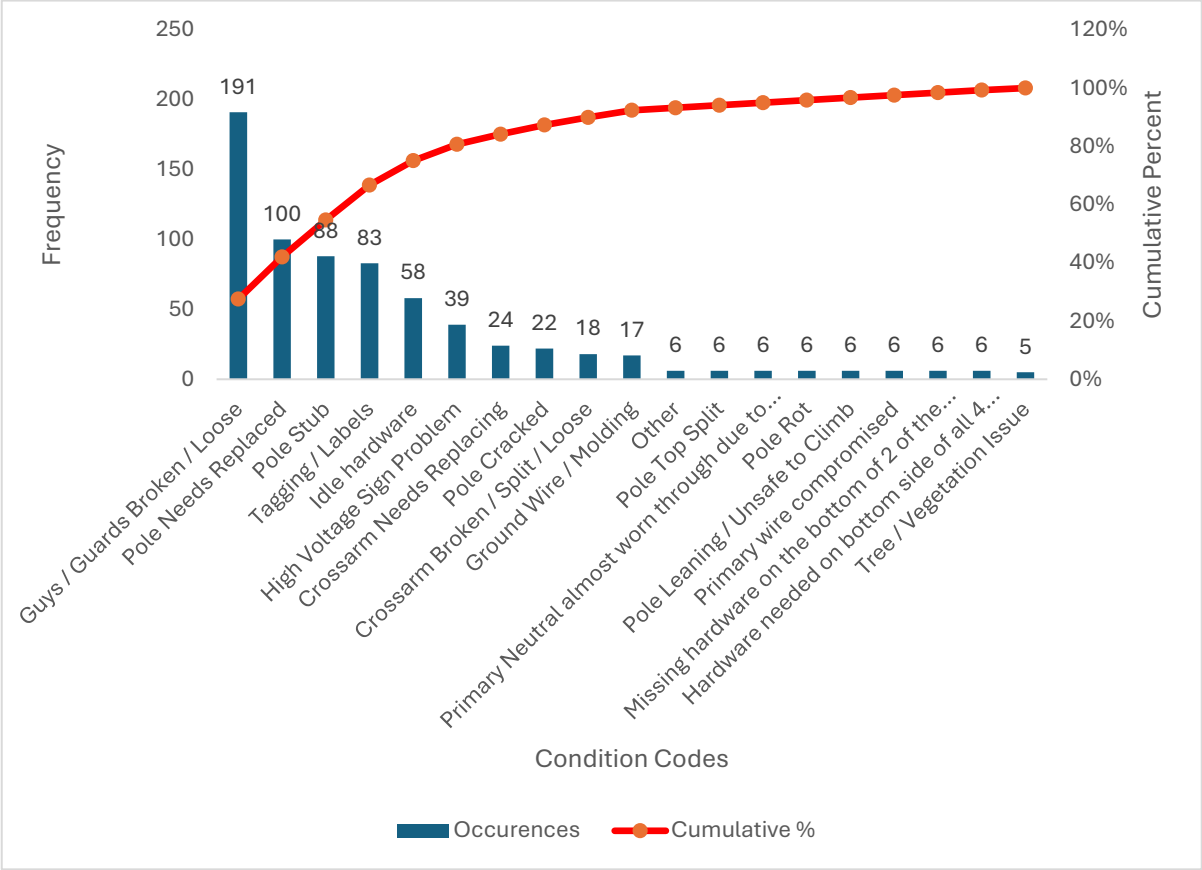

Figure 1 also illustrates that the Topaz circuit's condition issues were highly concentrated in a small number of defect categories, several of which are associated with direct reliability or safety risk. The fact that more than half of all observed defects fall

[62] Attachment 22, Data for Figure 1 comes from CalAdvocates-LIB-A2506017-001-Q2.xlsx.

into just a few categories underscores that the circuit exhibited systemic, not isolated, infrastructure problems.[63]

Of the 19 unique condition types, the most common were some of the most serious: "Guys/Guards Broken/Loose" (191), "Pole Needs Replaced" (100), "Pole Stub" (88), "Pole Cracked" (34), and "Crossarm Needs Replacing" (24).[64] These are not superficial issues. They are direct indicators of potentially compromised structural integrity. Altogether, inspectors documented (693) corrective findings on the Topaz circuit.[65]

This distribution is clear: a significant proportion of Topaz structures failed inspection, and many required major corrective action, including full pole replacement.

C. Internal Processes That Obscured Urgency

Liberty's internal processes sometimes obscured the urgency of worsening safety risks. Major defects such as "Pole Cracked" and "Pole Needs Replaced" were reported on the same record as minor issues like "Idle Hardware" or "High Voltage Sign Problem," with all conditions assigned a single priority level and a single correction timeline.[66] This bundling pushed urgent structural hazards into repair timelines meant for low-risk issues.

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[63] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025.

[64] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025.

[65] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025.

[66] Attachment 23, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 6, November 1, 2025.

> Due to limitations in Liberty's data collection form during the early stages of its transition from using hard-copy forms to a dynamic electronic inspection form in Fulcrum, only one "Repair Date" field was available for each inspection record for inspections conducted in 2020.

Table 2:[67]
Sample List of Multiple Condition Codes

asset_id	record_id	inspection_date	asset_group	hftd	priority	status	condition_codes
40050	0afe3999-0f69-4626-a966-c0ceaa8b79c7	4/14/20	Pole	2	Level 3	Fail	['Crossarm Needs Replacing', 'Pole Needs Replaced', 'Pole Top Split']
156735	babbf408-caae-4fbb-9ba5-3609e58c43ec	4/16/20	Pole	2	Level 3	non-go	['Pole Rot']
40320	1c3f615c-f1a4-4df2-af4a-55f34fa0127d	4/16/20	Pole	2	Level 3	repaired	['Pole Cracked', 'Pole Needs Replaced', 'Pole Stub']
40121	f726b5d5-5780-4ec3-964c-9b9c75395b64	4/17/20	Pole	2	Level 2	repaired	['Crossarm Broken / Split / Loose', 'Crossarm Needs Replacing', 'Guys / Guards Broken / Loose', 'Pole Stub']
80919	d6d196b3-696d-45c1-bbb0-9c987e69e308	4/23/20	Pole	2	Level 3	repaired	['Crossarm Broken / Split / Loose', 'Crossarm Needs Replacing', 'Guys / Guards Broken / Loose', 'Pole Stub']
80918	4cd2fd2d-7805-4640-9f59-b3de4e2bc24a	5/5/20	Pole	2	Level 3	repaired	['Crossarm Needs Replacing', 'Pole Needs Replaced', 'Pole Top Split']
300405	ed3eb46d-2e0a-46ea-89ea-f0d599033206	5/6/20	Pole	2	Level 3	repaired	['Pole Rot']
150141	e0f3279e-e97d-4e6a-9bf9-d79700f70a45	5/6/20	Pole	2	Level 3	repaired	['Pole Cracked', 'Pole Needs Replaced', 'Pole Stub']
106400	51c0f373-154d-4214-9405-a977744dbb0f	5/8/20	Pole	2	Level 3	repaired	['Crossarm Needs Replacing', 'Pole Needs Replaced', 'Pole Top Split']
40529	2f8e3ea8-93c7-4814-8b6d-dda76695419b	5/15/20	Pole	2		non-go	['Pole Rot']
117466	8fba3f55-a097-4e38-a568-12695c576fe7	5/18/20	Pole	2	Level 3	repaired	['Pole Cracked', 'Pole Needs Replaced', 'Pole Stub']

Table 2 shows a sample of inspection records from the 2020 Asset Survey on the Topaz circuit. Each entry lists an asset that did not pass inspection, along with the priority level and the specific defects identified.[68] The records consistently show multiple simultaneous condition codes on individual poles, such as broken or loose guys, crossarm issues, slack or damaged conductor, and poles needing replacement.

Across the sample, the assets consistently exhibit multiple concurrent defects, many of which directly implicate structural integrity, electrical safety, or wildfire risk.

Liberty later amended its explanation to note that other fields, such as inspector comments and repair status indicators, could be used in combination to clarify individual

[67] Attachment 22, Data for Table 2 comes from CalAdvocates-LIB-A2506017-001-Q2.xlsx.

[68] GO 95 Rule 18(A)(2) states:

> The system defines three priority levels for responding to identified conditions. Level 1 involves immediate safety or reliability risks with high potential impact and requires prompt action, either full repair or a temporary fix that lowers the priority. Level 2 involves variable, non-immediate risks and must be corrected within a timeframe set by a qualified representative, not exceeding six months for Tier 3 fire risks, 12 months for Tier 2 fire risks or worker-safety issues, and 59 months for all other Level 2 conditions. Level 3 conditions present acceptable risk and require appropriate follow-up, such as re-inspection, re-evaluation, or repair.

conditions.[69] Liberty could not show that these other fields *were* used to clarify individual conditions or apply stricter repair timelines; Liberty merely stated that it was possible. Nevertheless, Liberty failed to afford appropriate priority to major defects, consistent with its failure to remedy these defects.

D. Untimely Corrective Work by Liberty Compounded Identified Hazards.

Evidence of Liberty's delays in addressing known safety issues is reflected directly in its own 2020 Asset Survey data for the Topaz circuit. Liberty completed 233 corrective repairs.[70] In fact, 17% of all Topaz circuit corrective repairs were completed past their GO 95 mandated deadlines.[71]

Table 3:[72]
Late Corrective Repairs on the Topaz Circuit

Asset ID	Inspection Date	Priority	Due Date	Repair Date	Days Late	Condition Codes
40121	4/17/2020	2	4/17/2021	6/13/2025	1,518	Crossarm Broken / Split / Loose, Crossarm Needs Replacing, Guys / Guards Broken / Loose, Pole Stub
186703	4/14/2020	3	4/13/2025	4/13/2025	116	Pole Needs Replaced, Pole Stub
40048	4/14/2020	3	4/13/2025	4/13/2025	116	Pole Needs Replaced, Pole Stub
102679	4/14/2020	3	4/13/2025	4/13/2025	116	Pole Needs Replaced, Pole Stub

[69] Attachment 24, Response (amended) to data request CalAdvocates-LIB-A2506017-016, question 6, October 24, 2025.

> A field was available to an inspector to indicate whether all repairs had been completed and another field was available in which to input comments regarding the individual repair(s), including the status of individual conditions identified.

[70] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025.

[71] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025.

[72] Attachment 22, Data for Table 3 comes from CalAdvocates-LIB-A2506017-001-Q2.xlsx.

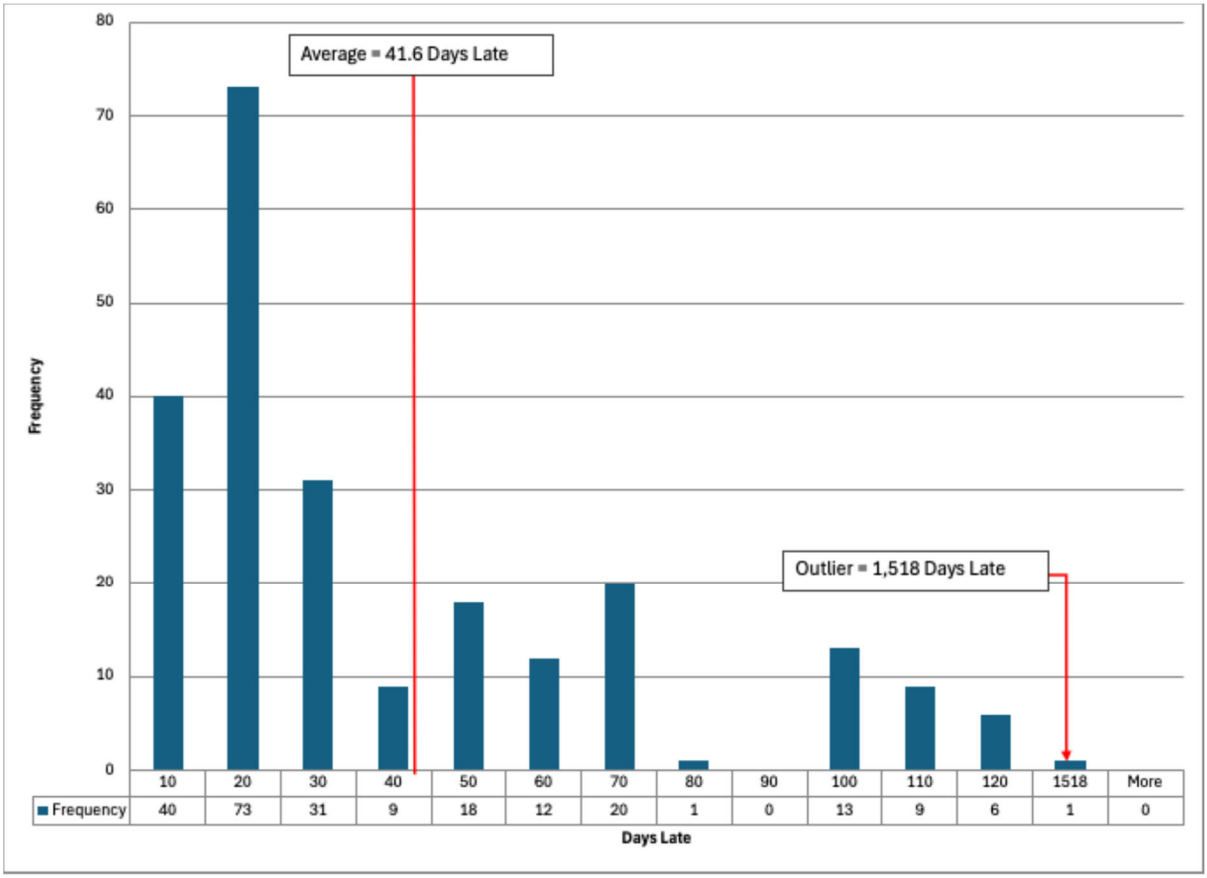
This is a measurable pattern showing that a portion of identified hazards remained in the field longer than allowed under Liberty's own standards and regulatory requirements. In addition, as discussed above, Liberty often bundled high-priority maintenance work with low-priority maintenance work, which could lead to high-priority work being deferred longer than was safe or appropriate. When taken in conjunction with Liberty correcting 17% of repairs after their deadlines, it is likely that medium and high-priority issues were completed on an unsafe timeline.[73]

Figure 2 shows a frequency distribution of late completions. The chart reveals that the majority of items fall within the 10- to 40-day late range, with the highest concentration around 20 days late. The vertical red line marks the average lateness of 41.6 days.[74] The most striking of these is the extreme outlier at 1,518 days late, which is called out separately on the chart.

[73] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025. Of the 1,352 inspections conducted, 233 had repair dates recorded later than required. This accounts for approximately 17% of all inspections.

[74] Attachment 22, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 2, tab "Detailed Inspection Results" in the attachment CalAdvocates-LIB-A2506017-001-Q2.xlsx., September 10, 2025.

Figure 2:
Late 2020 Asset Survey Corrections



	10	20	30	40	50	60	70	80	90	100	110	120	1518	More
Frequency	40	73	31	9	18	12	20	1	0	13	9	6	1	0

E. Lack of Visibility into High Risk Ignition Components

Compounding these vulnerabilities was Liberty's limited visibility into high-risk components. For example, conductor splices, which are known points of mechanical and thermal stress, were not tracked at all, meaning deteriorated splices could remain energized without detection.[75] Infrared inspections could have alerted Liberty to

[75] Attachmen 25, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 8, November 1, 2025.

> 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.

deteriorated splices, and in fact PG&E had employed infrared inspections of distribution infrastructure as early as 2018.[76] Had Liberty learned from its peer utilities and implemented infrared inspections, it would have been better situated to identify potential ignition-prone conditions in a timely manner.[77]

F. A Decade Without Quality Assurance Quality Control

These gaps in identification and correction were further worsened by a decade without quality assurance. From 2011 to 2020, Liberty performed no formal quality assurance or quality control (QA/QC) review of inspection data, making it impossible to verify whether hazards were accurately classified or whether repairs were completed as required.[78]

By contrast, SDG&E maintained an active QA/QC program prior to the Mountain View Fire. For example, through QA/QC supported equipment failure analysis, SDG&E identified high-risk "hotline clamp" connectors and, using its QA/QC inspections, located more than 6,000 structures containing them within HFTDs. This led to a systemwide replacement program beginning in 2019.[79]

G. Liberty Failed To Adequately Verify That Hazard Poles From 2013 Intrusive Pole Inspection Were Repaired.

Liberty performed an intrusive pole inspection in 2013 and identified 16 poles as "hazard" poles that required urgent replacement to meet safety standards. When asked to provide documentation showing that poles classified as "Hazard" after Liberty's 2013 intrusive pole inspections had been repaired or replaced, Liberty initially could not

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[76] Attachment 26, Pacific Gas and Electric Company. Infrared (IR) Inspections of Electric Distribution Facilities. May 15, 2018. https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/infrared-inspections-of-electric-distribution-facilities.pdf

[77] Attachment 27, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 4, September 10, 2025. "Liberty did not have an infrared inspection program during the specified time frame."

[78] Attachment 28, Response (amended) to data request CalAdvocates-LIB-A2506017-004, question 9, October 24, 2025. "Liberty did not have a formalized program for QA/QC for asset inspections during the specified time frame."

[79] Attachment 6, SDG&E WMP 2019 at 36.

produce any records confirming that the work was ever completed.[80],[81] In its response, Liberty acknowledged that it had "not located records showing when the corrective work was completed" and later attempted to reconstruct or "reverse engineer" completion dates for all but one of the work orders.[82],[83]

Liberty admitted that it couldn't find any records showing when repairs were actually finished.[84] Since the repairs lacked completion dates, Liberty reconstructed them after the fact by estimating when each repair likely occurred.[85] Liberty relied on GIS data, its work-order system, and field checks to triangulate the probable completion dates. The key point is that Liberty was not able to point to any original documentation showing, "This repair was completed on this date." Instead, the utility had to piece together the timeline manually, which highlights serious gaps in its recordkeeping.

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[80] Attachment 27, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 4, September 10, 2025. "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."

[81] Attachment 27, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 4, September 10, 2025. "Liberty has not located records showing when the corrective work was completed."

[82] Attachment 27, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 4, September 10, 2025. "Liberty has not located records showing when the corrective work was completed."

[83] Attachment 28, Response to data request CalAdvocates-LIB-A2506017-031, question 5, October 24, 2025.

> Based on data contained within Liberty's GIS database, its Fulcrum database, pole replacement work orders, and field verification, Liberty verified that all poles classified as "Non-Restorable" and "Hazard Poles" in attachment CalAdvocates-LIB-A2506017-001-Q4.xlsx, except for one, were replaced prior to November 17, 2020.

[84] Attachment 27, Response (amended) to data request CalAdvocates-LIB-A2506017-001, question 4, September 10, 2025. "Liberty has not located records showing when the corrective work was completed."

[85] Attachment 28, Response to data request CalAdvocates-LIB-A2506017-031, question 5, October 24, 2025.

> Based on data contained within Liberty's GIS database, its Fulcrum database, pole replacement work orders, and field verification, Liberty verified that all poles classified as "Non-Restorable" and "Hazard Poles" in attachment CalAdvocates-LIB-A2506017-001-Q4.xlsx, except for one, were replaced prior to November 17, 2020.

Rather than resolving the issue, this reconstruction effort underscored the unreliability of Liberty's recordkeeping and raised broader concerns about whether hazardous poles identified for urgent replacement had, in fact, been addressed at all.

H. A Pattern of Neglect Left the Topaz 1261 Circuit Vulnerable to Ignition.

Altogether, the evidence illustrates a circuit predisposed to fail. Hazardous conditions were widespread, but Liberty's documentation practices blurred their urgency. Required correction timelines were exceeded, leaving known defects in place for months or even years. High risk components lacked monitoring, and persistent oversight gaps allowed dangerous conditions to accumulate unchecked. The Mountain View Fire was not a sudden or unforeseeable event. Rather, it was the foreseeable result of a maintenance and oversight framework in which serious hazards were identified repeatedly but not effectively prioritized and remediated with the urgency ignition risk demands.

VI. LIBERTY'S MISMANAGEMENT ALLOWED PREVENTABLE HAZARDS TO TURN INTO THE MOUTAIN VIEW FIRE.

A. Liberty Failed to Mitigate Known Ignition Risks Before the Mountain View Fire

Liberty had direct knowledge, well before November 2020, that the Topaz 1261 circuit was vulnerable to line slap and posed a significant ignition risk.[86] Covered conductor, a widely recognized, low-cost, and highly effective ignition risk mitigation, was already known as a solution capable of dramatically reducing the likelihood of

[86] Attachment 29, Response to data request CalAdvocates-LIB-A2506017-032, question 4, October 24, 2025. "Based on review of historical outage data and OMS records, Liberty identified thirty one outages on the Topaz 1261 Circuit from 2015 through 2020 that were identified as suspected wire slapping events."

conductor contact.[87],[88] Nevertheless, the Mountain View Fire occurred while Phase Five of the Topaz 1261 circuit covered conductor installation remained incomplete.[89]

Liberty planned to rebuild segments of the Topaz 1261 Circuit in phases, starting near the California - Nevada border and progressing toward the end of the line in Walker, CA.[90] By 2020, it had installed 3.17 miles of covered conductor and was in the middle of Phase Five at the time of the Mountain View Fire. On the morning of the fire, crews were reconductoring a segment about one mile northwest of the segments of the Topaz 1261 Circuit which separated and ignited the Mountain View fire. This segment was located in Phase six, the final 1.5 mile section, completed in 2022.[91]

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[87] Attachment 7, Ex. Liberty-03, at 17. "Later phases involved installation of covered conductor. Covered conductor has a protective sheath that protects the conductor from risks associated with contact by animals, vegetation, another line, or the ground, thereby significantly reducing the risk of ignition."

[88] Attachment 30, Southern California Edison (SCE), 2019 Wildfire Mitigation Plan, February 6, 2019 (SCE 2019 WMP), at 51-52. SCE states that "the benefits of covered conductor significantly outweigh the increased cost of covered conductor (compared to bare conductor)" and that "covered conductors are more economical for most applications."

[89] Attachment 7, Ex. Liberty-03, at 13.

> To that end, at the time of the fire, Liberty was proactively rebuilding the Topaz 1261 Circuit (referred to as the "Topaz Line Rebuild Project"). While the Specific Facilities had not yet been rebuilt, they had a triangular crossarm configuration that allowed for greater spacing and clearances between conductors than flat-top configurations with all phases supported by horizontal crossarms.

[90] Attachment 7, Ex. Liberty-03, at 17 – 18.

[91] Attachment 7, Ex. Liberty-03, at 17.

> This was a multi-year project and the original design specified upgrading overhead lines from existing #4 ACSR conductor to #2 ACSR conductor. #2 ACSR conductor is larger in diameter, stronger, and able to carry more load. Later phases involved installation of covered conductor. Covered conductor has a protective sheath that protects the conductor from risks associated with contact by animals, vegetation, another line, or the ground, thereby significantly reducing the risk of ignition. The covering also helps protect the equipment from severe winds and extreme cold. Other utilities in California were similarly just beginning to deploy expanded covered conductor programs through distribution reconductoring projects aimed at reducing wildfire risk. The Commission approved the Topaz Line Rebuild Project and scope in D.20-08-030, stating "We find it reasonable to approve the project for it adds to Liberty's system reliability, wildfire risk mitigation, and a stronger circuit system. Costs are approved for this project from 2019 through 2021.

Although Liberty's modernization efforts identified severe hazards, the solution came too late to prevent the ignition that ultimately led to the catastrophic wildfire. Despite Liberty's knowledge that the Topaz 1261 Circuit was prone to line slap and was among the worst circuits for reliability, Liberty did not appropriately prioritize the circuit for hardening or other mitigation to reduce the ignition risk on the circuit.

B. No Records of GO 95 Extensions or Risk Mitigations

Liberty's inability to furnish documentation on how it managed overdue corrective actions between 2016 and 2021 reflects a breakdown in compliance oversight.[92] The company kept no records of GO 95, Rule 18 due date extensions and no log showing when extensions were granted, who approved them, or why they were justified.[93] Liberty also had no evidence of interim ignition risk mitigations for hazards that remained uncorrected during extended deferments.[94]

In the absence of any formal due date extension documentation, Liberty has no basis to show that the due date extensions complied with the GO 95 requirement that they be justified by "reasonable circumstances."[95] This failure in recordkeeping prevents

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[92] California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Construction, Rule 18, January 2020.

> Correction times may be extended under reasonable circumstances, such as:
>
> - Third party refusal
> - Customer issue
> - No access
> - Permits required
> - System emergencies (e.g. fires, severe weather conditions)

[93] Attachment 20, Response (amended) to data request CalAdvocates-LIB-A2506017-031, question 4, October 31, 2025. "Liberty is not aware of records formally tracking due-date extensions on the Topaz 1261 Circuit in the specified time frame."

[94] Attachment 20, Response (amended) to data request CalAdvocates-LIB-A2506017-031, question 4, October 31, 2025. "Liberty is also not aware of records formally tracking interim risk controls associated with due-date extensions on the Topaz 1261 Circuit in the specified time frame."

[95] Attachment 23, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 6, November 1, 2025.

> Liberty attempted to complete all compliance-based conditions by the assigned due dates, though, for some conditions, factors beyond Liberty's control, such as

Liberty from demonstrating that it managed safety obligations effectively during the years leading up to the Mountain View Fire.

C. Liberty's Corrective Work Backlog was too Large to Resolve in a Timely Manner

When Liberty conducted its systemwide 2020 Asset Survey, it uncovered an overwhelming number of defects that may have exceeded its capacity for timely remediation.[96] Rather than compelling Liberty to take immediate corrective action, the survey created a backlog that persisted and still remains unfinished as of 2025.[97] Even after introducing new dashboards around 2023 and transitioning to yet another asset management application in 2025, the backlog persisted.[98] These modernization efforts identified systemic hazards but did not translate into timely corrective work. The sheer size and persistence of the backlog demonstrate that Liberty lacked the systems and resources needed to address the risks that had accumulated over years.

> permitting, customer refusal, access difficulties, and emergencies such as the Covid-19 pandemic, may cause Liberty to require additional time to complete the remediation. Pursuant to GO 95, Rule 18(A)(2)(b), such "reasonable circumstances" can justify an extension of the remediation timeframe.

[96] Attachment 31, Response (amended) to data request CalAdvocates-LIB-A2506017-016, question 2, October 24, 2025. "Given the larger number of issues identified from the asset survey and its systemwide nature, as of today, Liberty is still addressing small number of corrective work orders identified during the asset survey."

[97] Attachment 31, Response (amended) to data request CalAdvocates-LIB-A2506017-016, question 2, October 24, 2025. "Given the larger number of issues identified from the asset survey and its systemwide nature, as of today, Liberty is still addressing small number of corrective work orders identified during the asset survey."

[98] Attachment 32, Response (amended) to data request CalAdvocates-LIB-A2506017-016, question 3, October 24, 2025.

> Liberty generally tracked completed repair work in the dynamic digital data collection tool used during the inspections. In approximately 2023, a dashboard was created in an asset tracking application to track the progress of corrective work. In early 2025, Liberty transitioned to using another asset tracking application, also equipped with a dashboard.

D. Poor Data Integrity Undermined Hazard Tracking

The method that Liberty relied on to manage corrective repairs lacked the data integrity necessary for effective risk monitoring. Liberty used placeholder dates such as January 1, 2020, whenever actual exact repair or replacement dates were unknown.[99]

Even after Liberty's assertion that due dates were "systematically entered" in 2023 as part of its transition to digital records, this practice is indicative of the shortcoming in its work monitoring method.[100] Retroactively assigning due dates years after hazards were first identified, rather than using due dates at the time of inspection to execute a timely corrective action, potentially renders the entire work monitoring system ineffective. GO 95, Rule 18 deadlines are meant to influence real-time prioritization decision, escalation, and remediation. Due dates are not intended to be reconstructed years later as a data cleanup exercise.

Liberty's retroactive data entry did nothing to ensure that hazards were repaired when they should have been, nor did it provide visibility into how long dangerous conditions were allowed to persist. Instead, it exposed Liberty's lack of a functional mechanism to monitor risk progression, enforce deadlines, or meet its own safety obligations during the period when these hazards were active in the field.

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[99] Attachment 23, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 6, November 1, 2025.

> The inspection records in which the dates in column L appear earlier than the dates in column C poles correspond to poles that were replaced in 2020 for which Liberty did not have specific dates of replacement. The date 01/01/2020 was used for those poles to indicate that the pole replacements were completed in 2020.

[100] Attachment 23, Response (amended) to data request CalAdvocates-LIB-A2506017-015, question 6, November 1, 2025.

> [A]s part of its transition to digital inspection records and effort to refine its electronic data collection and tracking processes over time, in approximately 2023 Liberty systematically entered due dates for issues in the system from prior inspections corresponding to the timelines set forth in GO 95, Rule 18, based on the date when inspections were performed.

VII. CONCLUSION: LIBERTY ALLOWED DETERIORATED INFRASTRUCTURE AND UNMANAGED RISKS TO CREATE THE CONDITIONS FOR WILDFIRE IGNITION.

A prudent manager knows that operating aging and deteriorated assets in a high wind, high fire-threat area creates significant ignition hazards. Had Liberty conducted timely inspections and assessments before 2020, it would have identified the same structural defects, widespread deterioration, and high ignition risk conditions later captured in the 2020 asset survey. Instead, Liberty delayed operated without comprehensive knowledge of their system from 2011 to 2020. Moreover, Liberty has not demonstrated that it completed patrol inspections in compliance with GO 165. Once the 2020 asset survey finally exposed the scale of system degradation, the resulting scope of corrective work remained unresolved through multiple fire seasons. Furthermore, Liberty's poor recordkeeping renders it impossible to determine if Liberty timely addressed hazard poles, whether Liberty assigned low-priority corrective timelines to urgent issues, and whether Liberty extended due dates beyond those mandated by GO 95, Rule 18.

Liberty's inability to produce complete inspection records, documentation of corrective actions, or evidence of interim risk controls mean that the company cannot verify that its facilities were safe or compliant with GO 95 and GO 165. When Liberty eventually adopted improved inspection tools and asset management systems, those systems revealed systemwide deficiencies that since before 2011. The absence of effective oversight and reliable recordkeeping deprived Liberty of situational awareness and allowed hazards to compound over time.

Although Liberty repeatedly identified risks on the Topaz 1261 circuit, it failed to correct those hazards with the urgency required for infrastructure operating in an environment well known for high wind and HFTDs.

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, Wildfire Safety Section.

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

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

I have 31 years of experience in the power and energy sector, having worked for companies including Pacific Gas and Electric Company (PG&E), GE Power, and Shell 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.

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

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

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

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

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

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

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

This concludes my statement of qualifications.