

HEARING EXHIBIT SBUA-02

A.25-06-017

**Attachment - Liberty CalPeco's
Response to DR SBUA-Liberty-DR-01**



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December 5, 2025

Liberty Utilities (CalPeco Electric) LLC

**A.25-06-017
WEMA**

Small Business Utility Advocates

Data Request No.: SBUA-Liberty-DR-01
Requesting Party: Small Business Utility Advocates
Originator: Ariel Strauss, ariel@utilityadvocates.org
James Birkelund, james@utilityadvocates.org
Date Received: November 10, 2025
Due Date: November 24, 2025

Attachments to these responses contain information marked confidential in accordance with applicable law and regulation. Confidential information is being provided pursuant to the Non-Disclosure Agreement executed by SBUA on December 5, 2025. Public disclosure is restricted.

REQUEST NO. 1:

Please provide copies of or access to all data responses to other intervenors as of the date of this data request. Provide all confidential attachments and full working Excel files.

RESPONSE:

Pursuant to the Non-Disclosure Agreement executed by SBUA on December 5, 2025, Liberty is providing its responses to data requests in this proceeding served to date, including confidential responses and attachments, in confidential attachment *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*.

REQUEST NO. 2:

Provide Excel versions of all tables and workpapers and PDFs of all reports and attachments for the application volume as well as volumes Liberty-01 to 07. SBUA is looking for access to all data, workpapers and reports not contained in testimony. Do not send copies of reports listed via links in footnotes, unless those links are non-functioning.

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows: Pursuant to the Non-Disclosure Agreement executed by SBUA on December 5, 2025, Liberty is producing confidential versions of *Liberty-02: Ignition* and *Liberty-05: Litigation and Claims Resolution*. See confidential attachment *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q2.zip*. Please note that attachments to the fire agency report attached as Appendix A to *Liberty-02: Ignition* are contained within *CONFIDENTIAL-CalAdvocates-LIB-A2506017-10-Q1.zip*, provided in Liberty's response to CalAdvocates-LIB-A2506017-10, Question 1. This confidential file is contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, attached to Liberty's response to Question 1 of this set of data requests.

Liberty is also producing a workpaper used in support of its opening testimony. Please refer to *Mountain View WEMA Workpaper.xlsx*, attached to Liberty's response to Question 1 of TURN-Liberty-001, which is contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, attached to Liberty's response to Question 1 of this set of data requests.