

HEARING EXHIBIT SBUA-03

A.25-06-017

**Attachment - Liberty CalPeco's
Response to DR SBUA-Liberty-DR-02**



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December 4, 2025

Liberty Utilities (CalPeco Electric) LLC

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

Small Business Utility Advocates

Data Request No.: SBUA-Liberty-DR-02
Requesting Party: Small Business Utility Advocates
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Date Received: November 18, 2025
Due Date: December 4, 2025

Attachments to these responses contain information marked confidential in accordance with applicable law and regulation. Liberty will provide confidential information to SBUA once it executes the Nondisclosure Agreement that Liberty sent to SBUA on December 1, 2025. Public disclosure is restricted.

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.

Liberty understands this request to be encompassed by Question 1 of SBUA-Liberty-DR-01. Please see *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

2. Please address the following:

I. Crew Activity and Line Conditions

On page 11 of Ex. Liberty-02, Liberty states “In response, field personnel patrolled the Topaz 1261 Circuit downstream of the 1261 R2 Recloser to the end of the line, including the subject span between the East Pole and West Pole. As a precaution, field personnel removed slack from a

stretch of the Topaz 1261 Circuit located northwest of the West and East Pole.” Related to this statement, please answer the following questions or provide the data requested:

REQUEST NO. 1:

Identify all Liberty personnel (by aliases or assigned number) who performed work on the Topaz 1261 Circuit on November 17, 2020, including their roles, shift times, and specific tasks.

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty understands this Question to be referring to work on November 17, 2020 before ignition of the Mountain View Fire. Electric Inspector 00003028 and Electric Troubleman 00003089 performed work on the Topaz 1261 Circuit on November 17, 2020.

Liberty’s records indicate that on the morning of November 17, 2020, Liberty Electric Troubleman 00003089 installed bidirectional meters at 106834 S US Highway 395 (Mountain View Barbeque) and at 103 Mule Deer Road, and also responded to reports of a tree damaging a low voltage service drop at Coleville High School. Electric Troubleman 00003089 also investigated a limited outage near Wunderlich Way in the morning on November 17, 2020.

Liberty’s records indicate that on the morning of November 17, 2020, Liberty Electric Inspector 00003028 supervised reconductoring associated with Phase Five of the Topaz Line Rebuild Project. Electric Inspector 00003028 also removed slack on a portion of the Topaz 1261 Circuit located northwest of the Subject Span after the 9:48 a.m. outage, as well as after an earlier outage near Wunderlich Way. Electric Inspector 00003028 supervised electrical workers from PAR Electric, who were assisting.

REQUEST NO. 2:

Describe the scope, location, and method of the reconductoring work performed on the Topaz 1261 Circuit on the morning of November 17, 2020.

RESPONSE:

Liberty objects to this Question as vague, ambiguous and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows: As described in *Liberty-03: Prudence of Operations*, on the morning of November 17, 2020, Liberty was implementing Phase Five of its Topaz Line Rebuild Project. The Project involved hardening the Topaz 1261 Circuit as described in Liberty’s testimony. Liberty’s records indicate that on the morning of November 17, 2020, field personnel were working near 38.520021427004636, -119.4843215509223. Procedures and specifications for Phase Five of the Topaz Line Rebuild Project are detailed in attachment *CONFIDENTIAL-Topaz Line Rebuild - Phase Five – As Built.pdf*, which Liberty provided in response to Question 5 of CalAdvocates-LIB-A2506017-018, which is contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

REQUEST NO. 3:

Produce all work orders, job hazard analyses, and field instructions issued for the Topaz 1261 Circuit on November 17, 2020.

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows: Please see procedures and specifications for Phase Five of the Topaz Line Rebuild Project provided in response to Question 2 of this set of data requests. Please also see *CONFIDENTIAL-Attachment to SBUA-Liberty-DR-02, Q3.zip*, which Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

REQUEST NO. 4:

State whether any conductor tensioning, slack removal, or pole hardware adjustments were performed between the West and East Poles on November 17, 2020.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty understands this Question to be referring to work on November 17, 2020 before ignition of the Mountain View Fire. Liberty is not aware of any conductor tensioning, slack removal, or pole hardware adjustments performed between the West and East Poles on November 17, 2020 prior to ignition of the fire.

REQUEST NO. 5:

Identify any pre-existing conditions, maintenance flags, or asset health concerns associated with the field phase conductor that later separated

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows: The East and West Poles were subject to detailed inspections in May 2020 by an experienced Liberty journeyman lineman and no issues related to the conductors were identified. Please see confidential attachment *CONFIDENTIAL-Attachment to SBUA-Liberty-DR-02, Q6.zip*, which Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

REQUEST NO. 6:

On page 22 of Ex. Liberty-03, Liberty states “The West Pole was inspected on May 6, 2020, and no conditions were identified. The East Pole was inspected on May 6, 2020, and the inspector identified a piece of idle hardware as a Level 3 repair, meaning the condition had to be remediated or reinspected within five years.”

Provide all records related to these inspections.

RESPONSE:

Please see confidential attachment *CONFIDENTIAL-Attachment to SBUA-Liberty-DR-02, Q6.zip*, which Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

REQUEST NO. 7:

In footnote 30 on page 22 of Ex. Liberty-03, Liberty states “Liberty has not located records confirming a patrol of the Specific Facilities between November 2017 and May 2020, when they were subject to a detailed inspection as described herein.”

Please confirm as of the date of this data request that Liberty has still not located records for inspections that it claims were performed during the period mentioned.

RESPONSE:

Liberty objects to this Question as vague and ambiguous and assuming facts. Subject to and without waiving its objections, Liberty responds as follows: Liberty reported in its GO 165 annual reports for 2018–2020 that it completed patrols on all of its circuits in each of those years (54 circuits in 2018 and 55 circuits in 2019 and 2020). Liberty has not located further documentation of patrols of the Topaz 1261 Circuit between November 2017 and the May 2020 detailed inspections.

REQUEST NO. 8:

On pages 17-18 of Ex. Liberty-03 Liberty states, “Indeed, on the morning of the fire, Liberty personnel and contractors were actively working on reconductoring a portion of the circuit approximately one mile northwest of the Specific Facilities. The Specific Facilities were located near the end of the mainline of the Topaz 1261 Circuit and were part of phase six of the project. Phase six encompassed the last approximately 1.5 miles of the circuit and was completed in 2022.”

When was the phase six portion planned for completion. If there were delays when was the phase’s initial or original planned completion date? Explain any delays to the planned completion date from the time of the project’s approval.

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-03: Prudence of Operations* (pp. 17-18), the Topaz Line Rebuild Project was designed and executed as a multi-year, multi-phase project. Liberty’s 2019 GRC testimony described the work planned to be executed between 2019 and 2021 and in future phases. Liberty was implementing phase five of the Topaz Line Rebuild Project at the time of the Mountain View Fire. As stated in *Liberty-03* (p. 18 n. 20), the RFP process for phase six was initiated during the early months of 2021 and construction on phase 6 was completed in 2022.

II. Faults and System Response

On page 10 of Ex. Liberty-02 Liberty states “Review of electrical event records indicates that Liberty’s system protection scheme operated as expected in response to faults on the Topaz 1261 Circuit on November 17, 2020. “Related to this statement, please answer the following questions or provide the data requested:

REQUEST NO. 9:

Provide all recloser event logs, SCADA data, and fault records for the Topaz 1261 Circuit from 8:00 a.m. to 12:30 p.m. on November 17, 2020.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Please see *Attachment to SBUA-Liberty-DR-02, Q9.zip*.

REQUEST NO. 10:

Explain the decision to place the 1261 R2 Recloser in “hotline tag” mode and describe how this affected fault response and line protection.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: “Hotline tag” refers to an alternate setting or mode that may be selected for a recloser in connection with maintenance work on or near energized equipment. The hotline tag mode provides for instantaneous tripping at a specified pickup amperage and disables automatic reclosing functionality (meaning the recloser trips to lockout after a single operation). Consistent with Liberty’s policies and procedures, the 1261 R2 Recloser had hotline tag settings enabled on the morning of November 17, 2020 to support reconductoring work associated with the Topaz Line Rebuild Project. Hotline tag settings were disabled and the 1261 R2 Recloser restored to normal at approximately 10:41 a.m. after field personnel released their non-reclose assurance related to the reconductoring work that morning, meaning they no longer required the 1261 R2 Recloser to be in hotline tag mode.

REQUEST NO. 11:

Describe the patrol and inspection procedures conducted after the 9:48 a.m. fault, including whether the span between the West and East Poles was visually inspected. Provide inspection logs for this fault at 9:48 a.m.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds that its records indicate the following as to the outage that occurred around 9:48 a.m. on November 17, 2020 after operation of the 1261 R2 Recloser: Liberty field personnel and contractors supporting reconductoring work associated with the Topaz Line Rebuild Project patrolled the Topaz 1261 Circuit south of the 1261 R2 Recloser. Liberty understands this inspection included the span between the East and West Poles.

REQUEST NO. 12:

State whether Liberty personnel observed or documented any abnormal conductor sag, movement, or contact prior to the ignition. Provide all documentation to support your response.

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty's records indicate that field personnel identified slack on the section of the Topaz 1261 Circuit where the reconductoring work was being performed. This section was located northwest of the Specific Facilities. The conductors in this section were not at usual tension due to the use of hot arms to support the reconductoring work. No abnormal sag or issues were identified with respect to the Subject Span. For additional information regarding observations related to conductors, please refer to documents provided in Liberty's response to Question 4 of CalAdvocates-LIB-A2506017-022, which is contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

REQUEST NO. 13:

Footnote 42 on page 33 states, "At the time of the fire, this dispatch group was responsible for Liberty's electric, water, and gas systems. Since then, Liberty has split the dispatch group by utility function. Now, there are usually one to three dispatchers on-site who are dedicated to addressing outages and other emergencies on Liberty's electric system."

Explain whether dispatchers were monitoring three different kinds of systems or whether the dispatchers were specialized.

RESPONSE:

As of November 17, 2020, dispatchers were addressing electric, water, and gas systems.

II. Conductor Failure and Metallurgical Evidence

On page 9 of Ex. Liberty-02, Liberty states "Although a metallurgist retained by plaintiffs in the civil litigation suggested the field phase conductor separated due to fatigue, evidence. In particular, fatigue results in striations and beachmarks that are clearly identifiable on the fracture surface. Related to this statement, please answer the following questions or provide the data requested:

REQUEST NO. 14:

Produce all metallurgical reports, lab notes, and photographs related to the field phase conductor that separated

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Liberty further objects to this Question to the extent it calls for documents protected by the attorney-client privilege or attorney work product doctrines. Subject to and without waiving its objections, Liberty responds as follows: Liberty understands this Question to be seeking materials relied upon and supporting the analysis of Liberty's metallurgy expert, Dr. Gary J. Fowler, as set forth in *Liberty-02: Ignition*, Section II.B.2. Please see images from examinations of conductors Liberty previously provided in its response to Question 1 of CalAdvocates-LIB-A2506017-038, which is contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025. Liberty also is providing the transcript and exhibits from the deposition of Dr. Fowler in the civil litigation associated with the Mountain View Fire. Liberty is also providing the transcript and exhibits from the deposition of Dr. Arun Kumar, plaintiffs' designated metallurgy expert in the civil litigation.

Please see *Attachment to SBUA-Liberty-DR-02, Q14.zip*, which provides deposition transcripts and exhibits associated with the depositions of Dr. Fowler and Dr. Kumar.

REQUEST NO. 15:

Identify the personnel who performed the metallurgical analysis and describe their qualifications and methodology.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objection, Liberty responds as follows: Please see pages 29–33 of *Liberty-08: Witness Qualifications*, which describes Dr. Fowler's qualifications. Dr. Fowler's methodology is described in his report provided in response to Question 14 of this set of data requests.

For information related to Dr. Kumar, please see the transcript and associated exhibits provided in response to Question 14 of this set of data requests.

REQUEST NO. 16:

Provide evidence that Liberty has ruled out mechanical overstress, improper tensioning, or installation error as contributing factors to the conductor separation.

RESPONSE:

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows: Please see the metallurgical analysis of Dr. Gary J. Fowler described in *Liberty-02: Ignition*, pp. 7–10, and documents provided in response to Question 14 of this set of data requests. Please also see Section IV of *Liberty-03: Prudence of Operations*, for an overview of the design and construction of the Specific Facilities.

III. Internal Communications and Post-Incident Review

On page 10 of Ex. Liberty-02, Liberty states “Following the fire, electrical event records were downloaded from the reclosers and analyzed by Liberty.” Related to this statement, please answer the following questions or provide the data requested:

REQUEST NO. 17:

Produce all internal emails, text messages, and incident reports discussing the Mountain View Fire, conductor failure, or crew activity on November 17, 2020.

RESPONSE:

Liberty objects to this Question as vague, ambiguous, overbroad, and unduly burdensome as framed. Liberty further objects to this Question to the extent it seeks materials protected by the attorney-client privilege and/or attorney work product doctrine. Subject to and without waiving its objections, Liberty responds as follows: Please see Liberty’s response to Question 3 of this set of data requests and attachments thereto regarding field crew work orders and instructions. With respect to reports related to the Mountain View Fire, please see the investigation report issued by the California Department of Forestry and Fire Protection (“Cal Fire”) that was attached as Appendix A to *Liberty-02: Ignition* and its attachments provided in response to Question 1 of CalAdvocates-LIB-A2506017-010. Please also see the report related to the Mountain View Fire issued by the Antelope Valley Fire Protection District provided in response to Question 7 of CalAdvocates-LIB-A2506017-010. Please also see Liberty’s incident report and follow-up summary submitted to the CPUC regarding the Mountain View Fire provided in response to Question 4 of TURN-Liberty-001. These materials are contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

REQUEST NO. 18:

Provide any post-incident root cause analyses, lessons learned, or corrective action plans developed in response to the Mountain View Fire.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Liberty further objects to this Question to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine. Subject to and without waiving its objections, Liberty responds as follows: Liberty conducted an after-action review of its response to the Mountain View Fire on January 7, 2021. The contents of this after-action review are subject to the privileges asserted above. Liberty is not aware of any formal root cause evaluation of the phase-to-phase contact on November 17, 2020. Liberty concluded that the phase-to-phase contact was likely the result of chaotic movement of the conductors in very high winds. Liberty did not identify any failed equipment on the Subject Span that would explain the phase-to-phase contact. As described in *Liberty-03: Prudence of Operations*, the conductor clearances were consistent with Liberty’s standards and exceeded GO 95 requirements. Post-fire field measurements recorded radial clearances of 54 inches between the center and field conductors and between the center and road conductors.

For summaries of opinions disclosed by Liberty's designated outside experts in civil litigation related to the Mountain View Fire, please see Liberty's response to Question 8 of CalAdvocates-LIB-A2506017-010 and the attachments contained therein, which are contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

REQUEST NO. 19:

State whether Liberty has revised its field procedures, training, or line inspection protocols as a result of this incident.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty periodically reviews and updates its inspection and maintenance policies and procedures. Liberty is not aware of specific revisions "as a result of" the Mountain View Fire.

REQUEST NO. 20:

On page 41 of Ex. Liberty-03 (Prudence volume), Liberty states, "In 2020, at least one recloser or group of reclosers was in "non-reclose mode" or "fire mode" on Liberty's system for a total of approximately 210 days, nearly two-thirds of the calendar year. The R1 and R2 Reclosers on the Topaz 1261 Circuit were in "non-reclose mode" and "fire mode," respectively, from May 29, 2020, until November 10, 2020, a continuous span of 165 days."

Were the Topaz reclosers switched to non-fire mode prior to the ignition? If so, why was this decision made?

RESPONSE:

Liberty refers SBUA to Liberty's testimony in Section VI.B.3 of *Liberty-03: Prudence of Operations*, which addresses these issues in detail (see pp. 41-43).

REQUEST NO. 21:

On page 39 of Ex. Liberty-03, Liberty states, "Because the Topaz and Muller 1296 R3 PSPS zones were windier than other PSPS zones under normal weather conditions, Liberty's protocol established slightly higher thresholds for wind gusts and FFWI:"

- a. Provide documentation and support for Liberty's PSPS criteria generally, and the Topaz line in particular.
- b. Provide evidence that windier lines should have higher thresholds.
- c. Provide weather reports for the Topaz line for the ten days preceding the incident.
- d. Provide documentation of staff and expert interpretation of the weather reports as they relate to whether to deenergize the Topaz line prior to the incident.
- e. Provide an explanation of Liberty's awareness of SCE's PSPS response in the same county prior to this incident.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Liberty further objects to this Question as overbroad and unduly burdensome to the extent it seeks records not maintained by Liberty in the ordinary course of business. Subject to and without waiving its objections, Liberty responds as follows:

- a. Liberty understands this subpart to refer to criteria Liberty used for PSPS decision-making as of November 17, 2020. Please refer to confidential file *CONFIDENTIAL-2019-08-20 Liberty Utilities de-energization thresholds.pdf* attached to Liberty's response to CalAdvocates-LIB-A2506017-011, Question 2, which is contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.
- b. Please refer to Liberty's response to subpart (a).
- c. Liberty is providing forecasts displayed on its fire weather dashboard between November 10-17, 2020 in attachment *SBUA-Liberty-DR-02-Q21.pdf*. Liberty does not have copies of forecasts from its fire weather dashboard for the requested period before November 10, 2020 due to the passage of time. Please also reference copies of emails and weather briefings Liberty received from the National Weather Service (NWS) in confidential attachment *CONFIDENTIAL-Attachment to TURN-Liberty-004-Q11.zip* attached to Liberty's response to TURN-Liberty-004, Question 11, which is contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.
- d. Liberty objects to this subpart as vague and ambiguous, including as to the phrase "staff and expert interpretation." Liberty monitored forecasted weather conditions across its service territory using information displayed in its fire weather dashboard. As described in *Liberty-03: Prudence of Operations*, those forecasts in the days leading up to November 17, 2020 did not meet Liberty's approved PSPS criteria or approach thresholds sufficient to initiate a potential PSPS event.
- e. Please refer to Liberty's response to CalAdvocates-LIB-A2506017-014, Question 5, which is contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.

IV. Regulatory and Financial

REQUEST NO. 22:

Under AB 1054, utilities can apply to the state Office of Energy Infrastructure Safety for a safety certification.

- (a) Was Liberty eligible for a safety certification under AB 1054 at the time of the Mountain View incident? Please explain.
- (b) If it was, why did Liberty not to have a safety certification from CalOEIS at the time of the Mountain View incident?

RESPONSE:

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

- a. As an electrical corporation, Liberty could request a safety certification under AB 1054. As explained in Liberty's Application (at p. 4), Liberty had not requested a safety certification as of November 17, 2020. Liberty has focused on implementing its Commission-approved Wildfire Mitigation Plan and on refining its wildfire mitigation initiatives to reduce wildfire risk within its service territory.
- b. Please refer to Liberty's response in subpart (a).

REQUEST NO. 23:

On page 6 of Ex. Liberty-06, Liberty states "Effective August 1, 2025, Liberty plans to enter into a secured seven-year note ("Note") that will replace the Mountain View Fire financing under the Credit Agreement. Liberty estimates that the Note will bear interest at 5.87%, and that rate is used herein to calculate estimated future financing costs. Liberty will quantify and update the financing costs incurred post-May 2025 in its rebuttal testimony in this proceeding."

Provide cost effectiveness results for any alternatives to Liberty's financing request that Liberty has performed. In particular, provide comparisons to shorter and longer duration financing options, such as Commercial Paper, or a ten year note.

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed, including as to the phrase "cost effectiveness results." Subject to and without waiving its objections, Liberty responds as follows: Liberty considered amortization schedules of varying lengths for its cost recovery proposal, which affected the length of financing required, uncertainties as to future interest rates, and the amount of potential associated costs. Please refer to *Liberty-06: Legal and Financing Costs* (p. 5) for discussion regarding Liberty's mode of financing. Please also see Liberty's responses to CalAdvocates-LIB-A2506017-012 and CalAdvocates-LIB-A2506017-033 and attachments contained therein, which are contained within *CONFIDENTIAL-Attachments to SBUA-Liberty-DR-01-Q1.zip*, a file that Liberty will provide to SBUA once it executes the Non-Disclosure Agreement Liberty sent on December 1, 2025.