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September 25, 2026

DATA REQUEST RESPONSE
LIBERTY UTILITIES (LIBERTY)

Data Request No.: OEIS-P-WMP_2026-Liberty-005

Requesting Party: Office of Energy Infrastructure Safety

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Subject: Q01. Regarding Liberty's outage data set
Q02. Regarding PSPS likelihood

Q01. Regarding Liberty's outage data set:

In Liberty's response to Data Request OEIS-P-WMP_2026-Liberty-002, Question 2, Liberty states that the "initial dataset of outage records 3,473 outages." On page 46 of its 2027 Base WMP,¹ Liberty states that "Liberty drops planned outages, outages resulting from loss of supply from NV Energy, and remaining outages with unknown causes from the dataset."

- a. Provide the number of outages that were removed from the outage dataset related to planned outages.
- b. Provide the number of outages that were removed from the outage dataset related to loss of supply from NV Energy.
- c. Provide the number of outages that were removed from the outage dataset related to unknown causes.

Response:

1.
 - a. 1,950
 - b. 230
 - c. 79

Q02. Regarding PSPS likelihood:

On page 55 of Liberty's 2027 Base WMP, Liberty states the following: "Liberty's current risk model incorporates PSPS likelihood by modeling an expected number of PSPS events per circuit per year. This expression of expected PSPS events per year is differentiated coarsely by each circuit's estimated wildfire risk: the top ten highest risk circuits in terms of aggregate risk receive a likelihood value of 1.0 PSPS events per year and the remaining circuits receive a likelihood value of 0.5 PSPS events per year."

- a. How did Liberty determine the likelihood values of 1.0 and 0.5?
- b. How did Liberty determine the threshold of using the top ten highest risk circuits?
- c. Provide a list of the total number of PSPS events that Liberty has historically implemented, broken out by circuit.

Response:

2.
 - a. Liberty's risk model adopts a value of one PSPS event per year for high-risk circuits and one PSPS event every two years for lower risk circuits. This approach was adopted as a coarse approximation of PSPS likelihood, and it was selected over initial draft versions of the PSPS likelihood model that relied on one PSPS event per year for all circuits. Liberty found this assumption did not reflect the

¹ Liberty 2027 Base WMP R0, published Aug. 31, 2026, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=61181&docket=WMP-LU&shareable=true>).

historical distribution of PSPS activity, which has focused on two circuits in the southern portion of Liberty's service territory (see answer to part c below).

Liberty build a tiered structure into the model so that PSPS likelihood would not be specified uniformly across all of Liberty's service territory. Liberty considers this tiering a reasonable approach, but not a final result of Liberty's risk model. Liberty has identified moving to a probabilistic, zone-specific PSPS likelihood model as a high priority in its risk assessment improvement plan.

Considering the impacts of climate change on future fuel moisture and drought conditions, one PSPS event per year on the highest risk circuits could be an underestimate of PSPS likelihood over the multi-decade planning horizon of grid hardening investments. For example, academic research has projected that an increase in abnormally dry autumn fuel conditions may lead to a greater share of the population exposed to PSPS events in California.² Liberty has identified in its risk assessment improvement plan that linking projections of climate change to PSPS likelihood is a high priority opportunity item.

- b. Liberty selected the top ten circuits by aggregate risk as the initial high-risk tier because Liberty's historical PSPS activity has been concentrated on a small subset of highest-risk circuits. Liberty expanded the selection to ten circuits because Liberty does not believe it is appropriate to only estimate PSPS risk on the two circuits that have been subject to historical PSPS conditions. Indeed, this wildfire season additional circuits have been considered in the scope of potential PSPS events. The ten highest risk circuits were selected as an initial baseline of PSPS likelihood, while Liberty refines its PSPS likelihood to a zone-specific PSPS likelihood model as described in the risk assessment improvement plan.

- c. See the table below.

Event No.	Circuit	Date
1	MULLER1296	11/11/2024
2	MULLER1296, TPZ1202	11/20/2024
3	MULLER1296, TPZ1202	11/22/2024
4	MULLER1296, TPZ1202	11/5/2025

² Abatzoglou, J. T., Smith, C. M., Swain, D. L., Ptak, T., & Kolden, C. A. (2020). Population exposure to pre-emptive de-energization aimed at averting wildfires in Northern California. *Environmental Research Letters*, 15(9), 094046. <https://doi.org/10.1088/1748-9326/aba135>