

To Liberty Utilities,

I conducted an independent evaluation of the Liberty Utilities' Physical Security Plan. Having conducted similar security plan third-party assessments for other utilities, I found the overall plan to be sufficient.

The risk assessment methodology relied heavily on assessing the mitigation measures already in place. The results of the assessment documented in Table 5 shows that Liberty is taking a very conservative approach and including all facilities as covered distribution facilities. This is excellent in terms of maintaining a focus on improving their physical security posture. The proposed upgrades for each of the Covered Distribution Facilities are consistent with incremental improvements, considering the low threat environment that these facilities exist within.

Using my experience in developing and reviewing physical security plans for critical infrastructure, I determined that Liberty's plan is consistent with good industry practices for physical security of critical infrastructure. I commend Liberty on the amount of preparation and research above and beyond what was required for the development of this plan. It was obvious that Liberty had taken physical security and the resiliency of their system seriously for many years, and not just in response to the CPUC's decision.

Best Regards,



Mike Gabriel  
Director, Corporate Operations