



September 9, 2026

Dan Marsh
Director, Rates and Regulatory Affairs
Liberty Utilities
701 National Avenue
Tahoe Vista, CA 96148

NOTICE OF DATA INACCURACY

Mr. Marsh:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Liberty Utilities (LU) in accordance with its 2025 Wildfire Mitigation Plan (WMP) and determined the existence of inaccurate data. Energy Safety therefore issues LU a Notice of Data Inaccuracy (NODI).

From June 1, 2026, to June 4, 2026, Energy Safety inspected 2025 Q3 and Q4 WMP initiatives in the vicinity of South Lake Tahoe, California. Energy Safety found the following data inaccuracies: Data Inaccuracies 1-12: The inspectors observed inaccurate data provided on expulsion fuse replacement; based on review of available online resources, the inspector observed new fuses were installed where no previous expulsion fuses existed to be replaced.¹ See Table 1: WMP Inspection Data Inaccuracies.

The data inaccuracies identified in this notice could make it appear as though LU reached the target set for its WMP initiatives when it has not. Therefore, LU may be found to fail to achieve the target for that WMP initiative. This failure may be raised in a future NON or in Energy Safety's 2025 Annual Performance Report on LU's WMP Performance.

Within 30 days from the issuance date of this NODI, LU should provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified inaccuracies. This response shall be filed in the Energy Safety e-Filing system under the 2025 NODI Docket,² and the associated file name(s) must begin with the NODI identification number.

¹ LU's 2023-2025 WMP stated that LU established a target of 500 expulsion fuse replacements in 2025. Because LU targeted expulsion fuse replacement under this initiative, and not installation of non-expulsion fuses where no fuses previously existed, the risk reduction impact of this initiative can only be met if the expulsion fuse is replaced with a non-expulsion fuse. See LU's 2023-2025 WMP at 170, available at:
https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2023-2025-WMPs%2fTN14694_20240903T213300_20240903_Liberty_2023_WMP_R6_Clean_Redacted.pdf.

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NODI>

Sincerely,

Patrick Doherty

Patrick Doherty
Program Manager | Performance Assessment Division
Office of Energy Infrastructure Safety
Patrick.Doherty@energysafety.ca.gov

Cc:

Peter Stoltman, Liberty Utilities
Peter.Stoltman@libertyutilities.com

Jordan Parrillo, Liberty Utilities
Jordan.Parrillo@libertyutilities.com

Babak Kaviani, Energy Safety
Babak.Kaviani@energysafety.ca.gov

Samuel Isaiah, Energy Safety
Samuel.Isaiah@energysafety.ca.gov

Shannon Greene, Energy Safety
Shannon.Greene@energysafety.ca.gov

Cecilia Yaniz, Energy Safety
Cecilia.Yaniz@energysafety.ca.gov
AssetPerformance@energysafety.ca.gov

Table 1: WMP Inspection Data Inaccuracies

Data Inaccuracy #	Record ID	Actual Structure ID	IOU Provided Structure ID	Grid Hardening ID	QDR Referenced	Lat/Long	Initiative Number	Data Inaccuracy Description
1	PAD_LU_CYA_20260602_0945	300140	300140	7b7c14d3-9c4f-4cab-ac1a-279f5699d51a	2025 Q4	38.95177160015, -119.94635255053	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
2	PAD_LU_CYA_20260602_1011	298158	298158	de052c72-33d6-4c8b-a1cc-1660c658a52a	2025 Q3	38.9494161697747, -119.946321799633	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
3	PAD_LU_AXS_20260602_1008	300206	300206	0ae6fcd8-336d-456d-9e5a-4ab5bd0878de	2025 Q4	38.9418215399349, -119.988562899908	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
4	PAD_LU_CYA_20260602_1133	300136	300136	78f1cb2b-1d78-4901-9445-1db038427daf	2025 Q3	38.9433478099751, -119.954508900442	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement

5	PAD_LU_CYA_20260 602_1524	300113	300113	92740522- 9cce-43e0- aa9a- 8300270dad 9d	2025 Q3	38.9393273496841, -119.955749799512	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
6	PAD_LU_BKA_20260 603_1034	300193	300193	a7f45fe2- 3140-4622- a045- 0738792b31 54	2025 Q4	38.9298083200493, -119.959674730428	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
7	PAD_LU_BKA_20260 603_1101	298169	298169	cb82fce4- 4e91-48d2- b8dc- 8a98c49d8c bb	2025 Q3	38.9319780096993, -119.963056200197	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
8	PAD_LU_BKA_20260 603_1124	298164	298164	3864bb64- 8e57-4a8c- 94c2- 08be40756e cf	2025 Q3	38.9343087501424, -119.962466600374	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
9	PAD_LU_AXS_20260 603_1316	300151	300151	219aa647- 25f3-4667- a457- 85c427a1d3 8f	2025 Q4	38.8514997704, - 120.012697219466	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement

10	PAD_LU_CYA_20260 603_1443	300163	300163	7afbac3f- 1c56-47d7- b386- 4aa445cbd0 6b	2025 Q3	38.9026379900316, -119.953285500101	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
11	PAD_LU_AXS_20260 603_1428	300188	300188	da804e05- 7b9a-46be- bd9f- a4f66c8a9e 5e	2025 Q4	38.8542817799093, -120.001672679836	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement
12	PAD_LU_BKA_20260 603_1333	298163	298163	27725915- 7a4d-4e85- b008- 50f535b6eb bb	2025 Q3	38.9378304396999, -119.9399299001	8.1.2.12 - Expulsion fuse replacement	Inaccurate data provided on expulsion fuse replacement

Exhibits

Exhibit A: Photo Log

Data Inaccuracy 1

Structure ID: 300140

	
Data Inaccuracy Img1-1: Overall Structure	Data Inaccuracy Img1-2: Structure ID
	
Data Inaccuracy Img1-3: View of CALFIRE exempt fuses.	

Data Inaccuracy 2

Structure ID: 298158

	
Data Inaccuracy Img2-1: Overall Structure	Data Inaccuracy Img2-2: Structure ID
	
Data Inaccuracy Img2-3: View of CALFIRE exempt fuses.	

Data Inaccuracy 3

Structure ID: 300206

			
Data Inaccuracy Img3-1: Overall Structure		Data Inaccuracy Img3-2: Structure ID	
			
Data Inaccuracy Img3-3: View of CALFIRE exempt fuses.			

Data Inaccuracy 4

Structure ID: 300136

	
Data Inaccuracy Img4-1: Overall Structure	Data Inaccuracy Img4-2: Structure ID
	
Data Inaccuracy Img4-3: View of CALFIRE exempt fuses.	

Data Inaccuracy 5

Structure ID: 300113

	
Data Inaccuracy Img5-1: Overall Structure	Data Inaccuracy Img5-2: Structure ID
	
Data Inaccuracy Img5-3: View of CALFIRE exempt fuses.	

Data Inaccuracy 6

Structure ID: 300193

	
Data Inaccuracy Img6-1: Overall Structure	Data Inaccuracy Img6-2: Structure ID

Data Inaccuracy 7

Structure ID: 298169

	
Data Inaccuracy Img7-1: Overall Structure	Data Inaccuracy Img7-2: Structure ID

Data Inaccuracy 8

Structure ID: 298164

	
Data Inaccuracy Img8-1: Overall Structure	Data Inaccuracy Img8-2: Structure ID

Data Inaccuracy 9

Structure ID: 300151

	
Data Inaccuracy Img9-1: Overall Structure	Data Inaccuracy Img9-2: Structure ID

Data Inaccuracy 10

Structure ID: 300163

	
Data Inaccuracy Img10-1: Overall Structure	Data Inaccuracy Img10-2: Structure ID

Data Inaccuracy 11

Structure ID: 300188

	
Data Inaccuracy Img11-1: Overall Structure	Data Inaccuracy Img11-2: Structure ID

Data Inaccuracy 12

Structure ID: 298163

	
Data Inaccuracy Img12-1: Overall Structure	Data Inaccuracy Img12-2: Structure ID