



Liberty
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October 9, 2026

VIA OEIS E-FILING

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Subject: Liberty's Response to Notice of Data Inaccuracy –
NODI_PAD_LU_CYA_20260602_0945

Dear Patrick Doherty:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to provide this response to the finding(s) identified in the "NODI_PAD_LU_CYA_20260602_0945" (Notice of Data Inaccuracy or NODI), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on September 9, 2026, regarding Energy Safety's inspection of work completed by Liberty in accordance with its Q3 and Q4 Wildfire Mitigation Plan ("WMP") initiatives.

The enclosed response demonstrates that Liberty reviewed and corrected reported expulsion fuse replacement data, implemented enhanced data governance controls to support future reporting, and confirmed achievement of its 2025 target with 641 completed expulsion fuse replacements. Liberty appreciates Energy Safety's continued efforts to identify, communicate, and resolve wildfire risks throughout California.

If you have any questions or require any additional information, please contact me at:

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Liberty Response

Energy Safety Finding:

Notice	Data Inaccuracy #	Location
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 1	Coordinates 38.95177160015, -119.94635255053
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 2	Coordinates 38.9494161697747, -119.946321799633
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 3	Coordinates 38.9418215399349, -119.988562899908
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 4	Coordinates 38.9433478099751, -119.954508900442
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 5	Coordinates 38.9393273496841, -119.955749799512
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 6	Coordinates 38.9298083200493, -119.959674730428
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 7	Coordinates 38.9319780096993, -119.963056200197
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 8	Coordinates 38.9343087501424, -119.962466600374
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 9	Coordinates 38.85149977704, -120.012697219466
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 10	Coordinates 38.9026379900316, -119.953285500101
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 11	Coordinates 38.8542817799093, -120.001672679836
NODI_PAD_LU_CYA_20260602_0945	Data Inaccuracy 12	Coordinates 38.9378304396999, -119.939929900

Summary of Energy Safety Findings¹:

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.²

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

¹ Energy Safety NODI_PAD_LU_CYA_20260602_0945

² 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.

Safety's 2025 Annual Performance Report on LU's WMP Performance.

Liberty Response:

Liberty has reviewed the data from this NODI and confirmed that the fuse locations included were reported as work counted towards the completion of this initiative although they were newly installed fuses where no previous expulsion fuses existed and they were not replacing existing expulsion fuses. An updated spreadsheet of all expulsion fuse replacement locations completed in 2025 has been included with this response as attachment:

"NODI_PAD_LU_CYA_20260602_0945_Response_Fuse_Replacements_2025." This update removes locations where non-expulsion fuses were installed where no previous expulsion fuses existed. Liberty has since updated its expulsion fuse replacement work order form with additional data governance to prevent these locations from being included in future reporting. Based on the updated data, Liberty confirms that it did achieve its fuse replacement target in 2025, with a total of 641 expulsion fuse replacements completed.