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October 5, 2026

VIA OEIS E-FILING

Patrick Doherty
Program Manager, Performance Assessment Division
Office of Energy Infrastructure Safety
715 P Street, 15th Floor
Sacramento, CA 95814

Subject: Liberty's Response to Notice of Non-Performance – NON_PAD_LU_CYA_20260603_1054

Dear Patrick Doherty:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to respond to the information contained in the Office of Energy Infrastructure Safety ("Energy Safety") "NON_PAD_LU_CYA_20260603_1054" ("Notice of Non-Performance" or "NON"), dated September 3, 2026, regarding Energy Safety's inspection of work completed by Liberty in accordance with its 2025 Wildfire Mitigation Plan ("WMP").

As discussed in the enclosed response, Liberty completed pole clearing work and reinspection resulting in additional pole clearing work between May and July 2026 on Pole #300535. Additional pole clearing was conducted on September 22, 2026 in response to Finding No. 2 listed in "NON_PAD_LU_CYA_20260603_1054" in compliance with PRC 4292 clearance requirements.

Liberty appreciates Energy Safety's continued efforts to identify, communicate, and resolve wildfire risks throughout California. If there are any questions, please contact me at:

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Liberty Utilities (CalPeco Electric) LLC
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Liberty Response

Energy Safety Finding:

In the 2025 Q4 Quarterly Data Report Submission, Liberty Utilities reported that work on Distribution pole replacements and reinforcements was completed at Structure ID 300535, Grid Hardening ID d5814071-bf99- 4176-86c5-6a236fecea79, at 355-445 Crystal Springs Rd, Markleeville, CA, 96120, USA, 38.7663773301906, -119.845228120272. At this location, the inspector observed that a non-CAL FIRE exempt fuse was present. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers Asset Image 1, Asset Image 2, depict a newly installed non-CAL FIRE exempt fuse at the reported location.

Energy Safety concludes that there is a deficiency because of these facts:

1. The inspector observed a non-CAL FIRE exempt fuse was present at the reported location.

2. The pole did not maintain a 10-foot fire break clearance around the pole.

Notice	Deficiency #	Location
NON_PAD_LU_CYA_20260603_1054	Deficiency 1	Coordinates 38.7663773301906, -119.845228120272

Summary of Energy Safety Findings[1]:

On June 3, 2026, Energy Safety conducted an inspection of Liberty Utilities' WMP initiatives in the vicinity of the city of Markleeville, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

> Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative Distribution pole replacements and reinforcements, LU failed to complete work on distribution pole replacements and reinforcements on Structure ID 300535, Grid Hardening ID d5814071-bf99-4176-86c5-6a236fecea79 at coordinates 38.7663773301906, -119.845228120272. Energy Safety considers this non-performance to be in the Minor risk category. LU must complete a corrective action for this deficiency by 12 months of this notice.

Liberty Response:

1. The fuse observed during the Energy Safety inspection was installed in a tap fuse application and was consistent with Liberty's design standards and approved material specifications at the time of installation. An approved CAL FIRE-exempt replacement product for this application was not available at that time.

[1] Energy Safety NON_PAD_LU_CYA_20260603_1054

Liberty is currently implementing a CMU fuse program for tap and mainline applications that will allow coordination with existing protection schemes. Liberty will utilize this technology for applicable future replacements.

2. Liberty regularly performs inspections and maintenance of poles subject to Public Resources Code ("PRC") 4292 requirements. Pole #300535 contains non-exempt equipment and is subject to PRC 4292 clearance requirements. The energy safety finding for Pole #300535 is based on an inspection that occurred on June 3, 2026; therefore, Liberty's response addresses compliance activities at this location during the 2026 fire season. To maintain compliance with PRC 4292 requirements, Liberty has taken the following inspection and maintenance activities at Pole #300535:
    a. May 21,2026: Pole clearing work completed
    b. June 29, 2026: Pole clearing inspection and work order created
    c. July 14, 2026: Pole clearing work completed
    d. September 22, 2026: Pole clearing work completed

Due to continually changing site conditions, including vegetation regrowth and wind-blown debris accumulating within the clearance area, maintaining strict, continuous compliance with PRC 4292 requirements is not reasonably practicable. Liberty therefore conducts routine inspections and maintenance to achieve the intent of the regulation to the fullest extent feasible.

Picture 1:
Pole #300535 clearing completed 5/21/2026



Picture 2:
Pole #300535 reinspected on 6/29/26 and new pole clearing work order created



Picture 3:
Pole #300535 clearing completed on 7/14/2026



Picture 4:
Pole #300535 clearing completed on 9/22/2026

