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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_1554

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_1554" ("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 field verification of Energy Safety's findings listed in "NON_PAD_LU_CYA_20260603_1554" at Structure ID 300114, Grid Hardening ID c4b8f654-b17a-469a-8294-d44fbf34e274 at Clean Cabin, 1291 Heather Lake Rd, South Lake Tahoe, CA. At the time of Energy Safety's inspection, the reported work at Structure ID 300114 associated with WMP Initiative 8.1.2.12 – Tree Attachment Removals was not fully complete. Liberty has implemented corrective actions to complete the reported tree attachment removal and to improve data tracking for tree attachment removals.

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:

Jordan Parrillo
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Tahoe Vista, CA 96148
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Liberty Response

Energy Safety Finding:

In the 2025 Q3 Quarterly Data Report Submission, Liberty Utilities reported that work on tree attachment removals was completed at Structure ID 300114, Grid Hardening ID c4b8f654-b17a-469a-8294-d44fbf34e274 at Clean Cabin, 1291 Heather Lake Rd, South Lake Tahoe, CA, 96150, USA, 38.9398428802693, -119.956317099675. At this location, the inspector observed that two tree attachments were still present at the reported location. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers Asset Image 1, Asset Image 2, Asset Image 3, Asset Image 4, depict incomplete removal of tree attachments. Energy Safety concludes that there is a deficiency because of these facts:

1. Two tree attachments were observed at the reported location.

Notice	Deficiency #	Location
NON_PAD_LU_CYA_20260603_1554	Deficiency 1	Coordinates 38.9398428802693, -119.956317099675

Summary of Energy Safety Findings[1]:

On June 2, 2026, Energy Safety conducted an inspection of Liberty Utilities' WMP initiatives in the vicinity of the city of South Lake Tahoe, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

> Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.1.2.12 - Tree attachment removals, LU failed to complete work on tree attachment removals on Structure ID 300114, Grid Hardening ID c4b8f654-b17a-469a-8294-d44fbf34e274 at coordinates 38.9398428802693, -119.956317099675. 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:

On September 16, 2026, Liberty completed field verification of Energy Safety's findings listed in "NON_PAD_LU_CYA_20260603_1554" at Structure ID 300114, Grid Hardening ID c4b8f654-b17a-469a-8294-d44fbf34e274 at Clean Cabin, 1291 Heather Lake Rd, South Lake Tahoe, CA. Liberty acknowledges that the reported work at Structure ID 300114 associated with WMP Initiative 8.1.2.12 – Tree Attachment Removals was not fully completed at the time of Energy Safety's inspection.

Liberty's review determined that this structure was part of a larger work package containing multiple poles. During project closeout, the work package was inadvertently reported as complete, resulting in Structure ID 300114 being reflected as completed in Liberty's records before all tree attachment removal work was finished. As a corrective action, in Quarter 1 of 2026, Liberty improved data tracking for tree attachment removals through a new work order

[1] Energy Safety NON_PAD_LU_CYA_20260603_1554

form with additional required fields, including confirming if any tree attachments remain at a pole location.

The remaining work associated with the tree attachment removal at Structure ID 300114 has been assigned to Liberty's engineering design contractor and is currently in the design phase. Following design completion, Liberty will obtain the necessary permits and complete construction to remove the remaining tree attachments. Liberty anticipates completing the corrective action by the end of Q1 2027.