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October 28, 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_1236

Dear Mr. 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_1236" ("Notice of Non-Performance" or "NON"), dated September 28, 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, Energy Safety's finding in this NON reflects Liberty's existing practice regarding covered conductor installation. Liberty is currently evaluating engineering solutions and construction practices for covered conductor terminations and upon completion of the engineering review and identification of an approved corrective approach, Liberty will update its work practices as appropriate and develop a plan to remediate applicable installations.

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 Response

**Energy Safety Finding:**

In the 2025 Q4 Quarterly Data Report Submission, Liberty Utilities reported that work on covered conductor installation was completed on Grid Hardening ID Sorensen's Tap A at Markleeville, CA, 96120, USA. On this Grid Hardening ID, the inspector observed that exposed bare conductor was present around jumper connector hardware consistently throughout the entirety of the covered conductor circuit segment submitted to Energy Safety. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to the report. Photo numbers Asset Image 1, Asset Image 2, Asset Image 3, Asset Image 4, Asset Image 5, Asset Image 6, Asset Image 7, Asset Image 8, Asset Image 9, Asset Image 10, Asset Image 11, Asset Image 12 depict examples of exposed bare conductor at jumper connector sites, representative of the condition observed throughout the submitted circuit segment.

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

1. Covered conductor was present throughout the circuit segment affiliated with GH ID Sorensen's Tap A.

2. Exposed bare conductor segments were found around jumper connector hardware throughout the circuit segment affiliated with GH ID Sorensen's Tap A.

3. Covered conductor work was consistently not completed at locations with jumper connector hardware throughout the entirety of the circuit segment associated with GH ID Sorensen's Tap A.

| Notice | Deficiency # | Location |
|---|---|---|
| NON_PAD_LU_CYA_20260603_1236 | Deficiency 1 | N/A |

**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 8.1.2.1 – Covered conductor installation, LU failed to complete work on covered conductor installation on the entire circuit segment affiliated with Grid Hardening ID Sorensen's Tap A. 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.

[1] Energy Safety NON_PAD_LU_CYA_20260603_1236

**Liberty Response:**

The condition observed during the Energy Safety inspection is consistent with Liberty's historical construction and maintenance practices for this application. Liberty has historically stripped the ends of covered conductors at termination points and left the exposed conductor section uninsulated. The exposed section gives lines crews a point to attach temporary protective grounds without piercing or damaging the covered conductor. This supports crew safety during maintenance, switching, and restoration work and preserves the integrity of the covering elsewhere on the line. Moving away from this practice will require research to provide crews with an alternative method to ground the line safety without compromising the covering, or a method to restore insulation at the exposed section while preserving crew access to grounding.

While this installation reflects Liberty's existing practice, Liberty recognizes that alternative termination methods may provide a more robust long-term solution. Liberty is currently evaluating appropriate engineering solutions and benchmarking termination practices with the Joint Investor-Owned Utility ("IOU") Working Groups, manufacturers, and construction contractors to confirm current industry practice and identify available alternatives for covered conductor termination.

Upon completion of the engineering review and identification of an approved corrective approach, Liberty will update its work practices as appropriate and develop a plan to remediate applicable installations. Liberty will address this condition through the following phased plan:

> **Phase 1, Evaluate design options:** Evaluate insulated termination and jumper connection options, alternative grounding methods, and methods to restore insulation at exposed sections, with manufacturers, the Joint IOU Working Groups, and construction contractors. Evaluation criteria include electrical performance, mechanical performance, installation feasibility, crew safety, and maintenance. Target: 02/01/2027
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> **Phase 2, Update standards:** Incorporate the selected termination method into Liberty's construction standards and issue the update to design and construction personnel. Target: 04/01/2027
>
> **Phase 3, Procure materials:** Order the connectors, covers, and related hardware required for the selected method. Target: 05/01/2027
>
> **Phase 4, Train personnel:** Train Liberty crews and contractors on the revised standard before field installation. Target: 07/01/2027
>
> **Phase 5, Remediate Sorensen's Tap A:** Install the selected termination method at the affected jumper connections and provide documentation to Energy Safety. Target: 9/15/2027 (deadline 9/28/2027)

Liberty will assess other covered conductor installations for this condition and prioritize any necessary remediation by wildfire risk and schedule the work around outage, weather, and access constraints.