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July 31, 2026

Docket# 2026-SCs

Via: Electronic Submission

Director Forest Michael Kaser
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, California 95814

Re: Liberty Quarterly Notification Pursuant to Public Utilities Code Section 8389(e)(7)

Dear Director Kaser,

Pursuant to Public Utilities Code Section 8389(e)(7), the April 2025 Office of Energy Infrastructure Safety's ("Energy Safety") Safety Certification Guidelines, Liberty Utilities (CalPeco Electric) LLC ("Liberty") hereby submits to the Office of Energy Infrastructure Safety ("Energy Safety") this notification detailing (1) the implementation of Liberty's 2026 Wildfire Mitigation Plan ("WMP"), (2) the implementation of the recommendations of Liberty's most recent safety culture assessment ("SCA"), (3) a statement of the recommendations of the Board of Directors Safety Committee ("Safety Committee") meetings that occurred during the quarter, and (4) a summary of the implementation of prior Safety Committee recommendations.¹

Sincerely,

A handwritten signature in black ink, appearing to read 'E = S R', with a stylized flourish at the end.

Eric Schwarzrock
President

¹ Item 4 is not applicable to Liberty's Q1 2026 Quarterly Notification because Liberty's Safety Committee was not established prior to Q2 2026.

TABLE OF CONTENTS

	<u>Page</u>
I. Quarterly information-Only Submittal to the CPUC	1
II. Quarterly Progress Report on WMP Implementation.....	1
1. Overview of Significant Achievements.....	1
2. Overview of Delays or Problems that Arose	3
III. Quarterly Progress Report on Implementing Safety Culture Recommendations	3
1. Continue to increase organizational learning by encouraging safety reporting and feedback and continue to improve leadership engagement to increase perceptions of support and commitment from leadership and create a work environment that is conducive for learning.	3
2. Continue developing a cross-functional culture committee comprised of individual contributors and managers to gather insights and take action to improve overall safety culture.....	4
3. Increase engagement with contractors to address continued low workforce survey participation from its contractor workforce and refine its safety culture objectives to target ways to improve contractor relationships and solicit feedback from them.	5
IV. Board of Directors Safety and Operations Committee Recommendations	5
1. Recommendations	5
2. Progress on Previous Recommendations	5

I. QUARTERLY INFORMATION-ONLY SUBMITTAL TO THE CPUC

Liberty submits this quarterly notification to the California Public Utilities Commission as an information-only submittal via email to Executive Director Leuwam Tesfai at leuwam.tesfai@cpuc.ca.gov, Safety Policy Division at safetypolicycentralfiles@cpuc.ca.gov, and the following service list: Order Instituting Rulemaking (R.) 21-10-001 (Order Instituting Rulemaking to Develop Safety Culture Assessments for Electric and Natural Gas Utilities), R.18-10-007 (Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901), or their successors, and the service lists for Liberty's most recent general rate case ("GRC") application proceeding Application (A.) 24-09-010. Additionally, this filing will be posted to the Liberty website at: <https://california.libertyutilities.com/verdi/residential/safety/electrical/wildfire-mitigation.html>.

II. QUARTERLY PROGRESS REPORT ON WMP IMPLEMENTATION

Liberty tracks quantitative targets for 21 initiatives established in its 2026-2028 Wildfire Mitigation Plan ("WMP"). Liberty's WMP initiatives are designed to mitigate the risk of wildfire due to a fault on the electric system and reduce the risk of Public Safety Power Shut-offs ("PSPS") for its customers. These mitigations are categorized across three categories within the WMP, which are: Grid Design, Operations and Maintenance, Vegetation Management and Inspections, and Situational Awareness and Forecasting.

1. Overview of Significant Achievements

In Quarter 2 ("Q2") of 2026 Liberty met or made significant progress towards meeting its WMP initiative targets for 2026. Liberty's achievements in Q2 of 2026 are below. This information was also submitted to Energy Safety as part of its Quarterly Data Report ("QDR") filing for Q2 2026 in accordance with Energy Safety guidelines.

- **Covered conductor installation (WMP-GDOM-GH-01):** 2026 WMP target is 3.9 circuit miles. Per Liberty's comments on the Energy Safety draft decision on its 2026-2028 WMP, Liberty increased its covered conductor installation commitment to 7.0 miles.² As of the end of Q2 2026, Liberty has completed 2.52 circuit miles of covered conductor installation. Target Attainment: 40%
- **Pole replacements and reinforcements (WMP-GDOM-GH-03):** 2026 WMP target is 400 poles. As of the end of Q2 2026, Liberty has completed 277 pole replacements. Target Attainment: 70%.
- **Traditional overhead hardening (WMP_GDOM-GH-05):** 2026 WMP target was 1.1 circuit miles. Per Liberty's comments on the Energy Safety draft decision on its 2026-2028 WMP, the shift from traditional overhead hardening to covered conductor installation for the 1.1 miles target better aligns with Liberty's recalibrated wildfire-only risk outputs required by Energy Safety's Revision Notice on Liberty's 2026-2028 Base WMP.
- **Tree attachment removals (WMP-GDOM-GH-12a):** 2026 WMP target is 60 tree attachments. As of the end of Q2 2026, Liberty has completed 74 tree attachment removals. Target Attainment: 123%.

² Opening Comments of Liberty Utilities (CalPeco Electric) LLC (U 933-E) on Office of Energy Infrastructure Safety Draft Decision on Liberty 2026–2028 Base WMP, March 9, 2026.

- **Expulsion fuse replacement (WMP-GDOM-GH-12b):** 2026 WMP target is 500 expulsion fuses. Per Liberty's comments on the Energy Safety draft decision on its 2026-2028 Base WMP, Liberty has increased its expulsion fuse replacement commitment to 1,000 expulsion fuses.³ As of the end of Q2 2026, Liberty has completed 1,029 expulsion fuse replacements. Target Attainment: 103%
- **Open wire/grey wire (WMP-GDOM-GH-12e):** 2026 WMP target is 5.2 circuit miles. As of the end of Q2 2026, Liberty has completed 7.35 miles of open wire/grey wire. Target Attainment: 141%.
- **Detailed asset inspections (WMP-GDOM-AI-01):** 2026 WMP target is 207 circuit miles. As of the end of Q2 2026, Liberty has completed 199.17 miles of detailed asset inspections. Target Attainment: 96%.
- **Intrusive pole inspections (WMP-GDOM-AI-02):** 2026 WMP target is 2,031 poles. Liberty generally conducts intrusive pole inspections in Q3. As such, as of the end of Q2 2026, Liberty has completed 0 intrusive pole inspections.
- **Patrol asset inspections (WMP-GDOM-AI-03):** 2026 WMP target is 553.4 circuit miles. As of the end of Q2 2026, Liberty has completed 553.4 miles of patrol asset inspections. Target Attainment: 100%
- **Other discretionary asset inspections: drone inspections (WMP-GDOM-AI-04):** 2026 WMP target is 127 circuit miles. Liberty began its other discretionary asset inspections in July of 2026. As such, as of the end of Q2 2026, Liberty had completed 0 miles of other discretionary asset inspections.
- **Quality assurance/quality control of asset inspections (WMP-GDOM-AI-05):** 2026 WMP target is 12% of detailed asset inspections. As of the end of Q2 2026, Liberty has completed 0% of its QA/QC asset inspections. Liberty typically completes its QA/QC asset inspections in Q4.
- **Substation inspections (WMP-GDOM-AI-06):** 2026 WMP target is 44 substations. As of the end of Q2 2026, Liberty has completed 28 substation inspections. Target attainment: 64%.
- **Detailed vegetation management inspections (WMP-VM-INSP-01):** 2026 WMP target is 233 circuit miles. As of the end of Q2 2026, Liberty has completed 178.41 miles of detailed vegetation management inspections. Target Attainment: 77%.
- **LiDAR vegetation management inspections (WMP-VM-INSP-03)** 2026 WMP target is 700 circuit miles. As of the end of Q2 2026, Liberty has completed 0 miles of LiDAR vegetation management inspections. Liberty typically completes its LiDAR vegetation management inspections in Q3. Target Attainment: 0%.
- **Pole clearing – required (WMP-VM-VFM-01-R):** 2026 WMP target is 4,500 poles. As of the end of Q2 2026, Liberty has completed 3,992 poles. Target Attainment: 89%.
- **Pole clearing – discretionary (WMP-VM-VFM-01-D):** 2026 WMP target is 400 poles. As of the end of Q2 2026, Liberty has completed 377 poles. Target Attainment: 94%.
- **Wood and slash management (WMP-VM-VFM-02):** 2026 WMP target is 280 acres. As of the end of Q2 2026, Liberty has completed 63.66 acres of wood and slash

³ Opening Comments of Liberty Utilities (CalPeco Electric) LLC (U 933-E) on Office of Energy Infrastructure Safety Draft Decision on Liberty 2026–2028 Base WMP, March 9, 2026.

management. Target Attainment: 23%.

- **Substation defensible space (WMP-VM-VFM-03):** 2026 WMP target is 12 substation inspections. As of the end of Q2 2026, Liberty has completed 12 substation inspections. Target Attainment: 100%.
- **Clearance (WMP-VM-VFM-05):** 2026 WMP target is 700 circuit miles. As of the end of Q2 2026, Liberty has completed 700 miles of clearance. Target Attainment: 100%.
- **Fall-in mitigation (WMP-VM-VFM-06):** 2026 WMP target is 220 circuit miles. As of the end of Q2 2026, Liberty has completed 102.5 miles of fall-in mitigation work. Target Attainment: 47%.
- **Vegetation management quality assurance and quality control (WMP-VM-QAQC-01):** 2026 WMP target is 228 circuit miles. As of the end of Q2 2026, Liberty has completed 232.9 miles of vegetation management for QA/QC work. Target Attainment: 102%.

2. Overview of Delays or Problems that Arose

Liberty has met or is on track to meet all of its WMP initiatives with quantitative targets, except for one WMP initiative, as discussed above. Liberty replaced the 2026 work previously planned as traditional overhead hardening (WMP_GDOM-GH-05) with covered conductor installation. The 1.1 mile target for traditional overhead hardening is now included in Liberty's increased covered conductor installation commitment of 7.0 miles. The shift from traditional overhead hardening to covered conductor installation for the 1.1 miles target better aligns with Liberty's recalibrated wildfire-only risk outputs required by Energy Safety's Revision Notice on Liberty's 2026-2028 Base WMP.⁴

III. QUARTERLY PROGRESS REPORT ON IMPLEMENTING SAFETY CULTURE RECOMMENDATIONS

On December 19, 2025, Energy Safety issued a Safety Culture Assessment ("2024 SCA") report to Liberty. In a March 30, 2026 letter to Energy Safety, Liberty agreed to implement all of the recommendations in the 2024 SCA and listed the actions to implement the recommendations. It is the most recent completed Safety Culture Assessment for Liberty. The recommendations and actions are as follows:

- 1. Continue to increase organizational learning by encouraging safety reporting and feedback and continue to improve leadership engagement to increase perceptions of support and commitment from leadership and create a work environment that is conducive for learning.**

In response to this recommendation, Liberty:

- Provided Radiant Leadership training to Operations leaders on June 2, 2026. The training covered effective communication methods, management styles, and accountability. One of the objectives of the meeting is to remind leaders how to foster a culture of support and trust, and to create an environment where the team members are empowered to learn and develop professionally.

⁴ The Office of Energy Infrastructure Safety Issuance of Revision Notice on the Liberty Utilities (CalPeco Electric), LLC 2026-2028 Base Wildfire Mitigation Plan, October 21, 2025.

- Liberty advertised and posted a safety concern intake form around the facilities with a QR code so employees can report safety concerns to the Joint Health and Safety Committee (“JHSC”). The submissions are automatically recorded in the committee’s SharePoint site, reviewed, and tracked via an action log. From implementation through June 30, 2026, several submissions were received and the JHSC has reviewed, discussed solutions, and assigned corrective actions to the appropriate owners. The intent is to be action-oriented, to address the concerns, and to further demonstrate Liberty’s commitment to addressing safety concerns and opportunities.
- Increased training opportunities available for leadership, field employees, and contractors. These will be scheduled for the second half of 2026.
- Partnered with outside vendor Echelon Front and provided Extreme Ownership training to operational leaders, frontline employees, and Liberty’s line contractor in June Q2 to further encourage and support learning and development.
- Increased training opportunities available for leadership, field employees, and contractors. These will be scheduled for the second half of 2026. This includes High-Quality Safety Observation, Crew Resource Management, and Work Readiness Training for Q3.
- Continues monthly safety training with field employees, led and attended by the new leadership established in March of 2026 to reset and influence a better safety culture.

2. Continue developing a cross-functional culture committee comprised of individual contributors and managers to gather insights and take action to improve overall safety culture.

In response to this recommendation:

In April, Liberty expanded its safety culture members to include field employees. In May, Liberty established a charter and renamed the committee to the Joint Health and Safety Committee. The JHSC provides a formal, collaborative forum for employees and management to identify safety concerns, review trends, discuss practical solutions, assign corrective actions, and track issues to closure. The JHSC is intended to support Liberty’s safety culture by ensuring that employee safety concerns are heard, documented, acted upon, and communicated back to the workforce. The JHSC further supports Liberty’s safety culture improvement efforts by serving as a cross-functional forum for employees and managers to discuss safety culture issues and implement improvement actions. The JHSC includes equal representation from management and employees and includes ten members, although the committee will be discussing expansion next month. Meeting minutes and an action log are tracked through a SharePoint site. The JHSC meets monthly or more frequently as necessary.

3. Increase engagement with contractors to address continued low workforce survey participation from its contractor workforce and refine its safety culture objectives to target ways to improve contractor relationships and solicit feedback from them.

In response to this recommendation:

- Liberty plans to establish the Contractor Academy to standardize expectations, training, contractor onboarding and supervision. The development of this new program is in progress.
- Liberty’s primary contractor attended the safety stand-downs held in Q1 and Q2 of 2026, along with Liberty’s employees. The joint safety stand-down conducted in June 2026 included reviewing industry incidents, the Fire Prevention Plan, rubber goods training, and the Cal OSHA wildfire smoke standard training. Over 80 attendees were present at this event, including 33 contractors and 53 Liberty employees. The Fire Prevention Plan training helps crews learn how to evaluate weather and field conditions before work begins to adjust work practices, tools, and equipment based on Liberty’s established fire potential index thresholds. Including contractors in this training reinforces wildfire prevention expectations, promotes consistent operational practices, strengthens communication between Liberty and its contractors, and provides additional opportunities for contractor engagement and feedback on fire prevention requirements.
- Liberty plans to establish the Contractor Academy to standardize expectations, training, contractor onboarding and supervision. The development of this new program is in progress.

IV. BOARD OF DIRECTORS SAFETY AND OPERATIONS COMMITTEE RECOMMENDATIONS

Liberty established a formal charter for its Safety and Operations Committee (“Safety Committee”). The charter was approved by the Board on April 23, 2026. The committee is responsible for:

- reviewing Liberty’s safety culture, goals, and risks;
- reviewing safety related incidents, measures and strategies to prevent;
- monitoring current and emerging safety matters;
- providing strategic guidance and recommendations to the Board and Liberty; and
- briefing the CPUC and Energy Safety on safety issues and performance.

1. Recommendations

Liberty’s board-level Safety Committee was established on April 23, 2026. The committee charter was introduced and adopted at the April 23, 2026, meeting. No recommendations were made at this meeting.

2. Progress on Previous Recommendations

Not applicable for Q2 2026. Liberty’s board-level Safety Committee was not established prior to Q2 2026.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Schwarzrock". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eric Schwarzrock
President