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June 26, 2025

To: Liberty Utilities
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Senior Manager, Rates and Regulatory Affairs
Liberty Utilities: 701 National Avenue Tahoe Vista, CA 96148

SUBJECT: Office of Energy Infrastructure Safety's Report on Liberty's 2023 Substantial Vegetation Management Audit

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on Liberty's 2023 Substantial Vegetation Management (SVM) audit. Energy Safety finds that Liberty substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 Wildfire Mitigation Plan for compliance year 2023.

The attached report follows Energy Safety's publication of its SVM audit on April 2, 2025, and Liberty's subsequent response on May 2, 2025. Pursuant to statutory requirements, a copy of this report is issued to Liberty, published on Energy Safety's 2023 SVM Docket¹ and provided to the California Public Utilities Commission.

Sincerely,

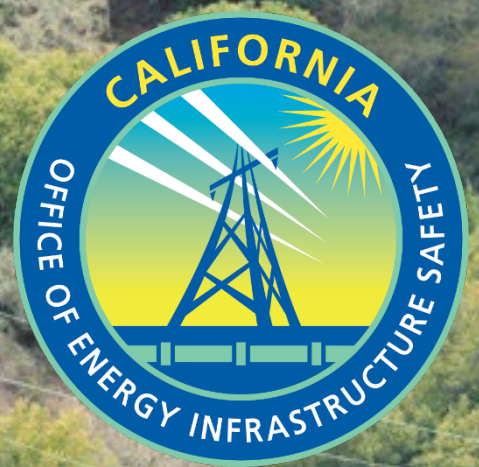
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¹ All documents related to Liberty's 2023 SVM audit are available on Energy Safety's e-filing system under the "2023-SVM" docket and available here: <https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-SVM>

Jordan Parrillo, Liberty

Attachment: Liberty Utilities 2023 SVM Audit Report



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

2023 SUBSTANTIAL VEGETATION

MANAGEMENT AUDIT REPORT

LIBERTY UTILITIES

June 2025

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1. INTRODUCTION	2
2. 2023 SVM AUDIT FINDINGS	3
3. SVM COMPLIANCE ANALYSIS.....	4
3.1 Initiative Level Assessment.....	5
8.2.3.4 Fall-in Mitigation.....	6
8.2.3.5 Substation Defensible Space	9
8.2.3.6 High-Risk Species.....	10
8.2.5 Quality Assurance and Quality Control.....	11
8.2.5 Open Work Orders.....	13
3.2 Programmatic Assessment	16
4. Conclusion	17

EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of Liberty Utilities' (Liberty) vegetation management commitments from its approved 2023-2025 Wildfire Mitigation Plan (WMP) on April 2, 2025.¹

The Liberty 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas.² In the Liberty Substantial Vegetation Management Audit (SVM Audit), Energy Safety found that Liberty did not provide information consistent with the completion of all work commitments for five of its 13 vegetation management initiatives.

Liberty submitted its Corrective Action Plan (CAP) addressing the deficiencies identified in the SVM Audit on May 5, 2025.³ Based on an analysis of Liberty's CAP as well as the analysis in the 2023 SVM Audit, Energy Safety found that Liberty substantially complied with four of the five deficient initiatives by supplying additional information and clarifications that demonstrated that either Liberty completed all or the majority of the work, or that Liberty completed other work which achieved the same program objective.

Given that the 2023 SVM Audit found that Liberty completed all work in eight initiatives and this analysis found that it substantially complied with four of the deficient initiatives, Liberty substantially complied with a total of 12 of the 13 vegetation management initiatives. Thus, Energy Safety found that programmatically, Liberty substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

¹ [Liberty's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true) (Rev. #3, Feb. 15, 2024)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true>).

² [Energy Safety's 2023 SVM Audit of Liberty](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58202&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58202&shareable=true>).

³ [Liberty's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58401&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58401&shareable=true>).

1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(c)(5), Energy Safety must annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The SVM Audit shall specify any failure of the electrical corporation to fully comply with the vegetation management commitments in its Wildfire Mitigation Plan (WMP).⁴ Energy Safety then provides the SVM Audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency therein. The electrical corporation submits its response to the SVM Audit in a Corrective Action Plan (CAP). Following receipt and review of the electrical corporation's CAP, Energy Safety completes an analysis of the CAP and issues an Audit Report to the electrical corporation identifying whether it substantially complied with a substantial portion of the vegetation management requirements in the compliance year.^{5,6}

Energy Safety published the 2023 Liberty SVM Audit on April 2, 2025.⁷ The Audit concluded that Liberty did not perform all the work specified in five of the 13 vegetation management initiatives in its 2023-2025 WMP. In response to the SVM Audit, Liberty submitted its CAP on May 2, 2025.⁸ Energy Safety reviewed Liberty's CAP and supporting information to determine whether it substantially complied with the substantial portion of their vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

This document is Energy Safety's Report on the 2023 SVM Audit of Liberty. The document is organized as follows:

- **Section 2** is a summary of the 2023 SVM findings published in the April 2, 2025 audit.
- **Section 3** includes Energy Safety's initiative level (3.1) and programmatic (3.2) compliance analysis of Liberty's CAP and supporting documentation and information.
- **Section 4** provides the basis for Energy Safety's conclusion that Liberty substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 WMP.

⁴ Pub. Util. Code, § 8386.3(c)(5)(A).

⁵ Pub. Util. Code, § 8386.3(c)(5)(C).

⁶ [2024 Compliance Guidelines](#), Section 8.1, (September 2024), p. 13.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true>).

⁷ [Energy Safety's 2023 SVM Audit of Liberty](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58202&shareable=true>).

⁸ [Liberty's 2023 SVM Audit Corrective Action Plan](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58401&shareable=true>).

2. 2023 SVM Audit Findings

The 2023 SVM Audit found that Liberty performed all required work in eight of the 13 initiatives and was deficient in the remaining five. Table 1 below is reproduced from Energy Safety's 2023 SVM Audit.⁹

Table 1. Liberty 2023 SVM Audit Finding Summary

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2 Vegetation Management Inspections	8.2.2.1 - 8.2.2.3 Vegetation Management Inspections	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.1 Pole Clearing	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.2 Wood and slash Management	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.3 Clearance	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.4 Fall-in Mitigation	Did not complete all work
8.2.3 Vegetation Fuels Management	8.2.3.5 Substation Defensible Space	Did not complete all work
8.2.3 Vegetation Fuels Management	8.2.3.6 High-Risk Species	Did not complete all work
8.2.3 Vegetation Fuels Management	8.2.3.7 Fire-Resilient Right-of-Ways	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Completed all work
8.2.4 Vegetation Management Enterprise	8.2.4 Vegetation Management Enterprise System	Completed all work
8.2.5 Quality Assurance and Quality Control	8.2.5 Quality Assurance and Quality Control	Did not complete all work
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Did not complete all work
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Completed all work

⁹ [Energy Safety's 2023 SVM Audit of Liberty](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58202&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58202&shareable=true>).

3. SVM COMPLIANCE ANALYSIS

Energy Safety must assess whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the compliance year.¹⁰ The determination of substantial compliance is based on an analysis of both the electrical corporation's compliance with each vegetation management initiative as well as the program overall.

The initiative level analysis includes:

- 1) **Achievement of Objective** – Determination of whether the electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs; and
- 2) **Good Faith Effort** – Determination of whether the electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.

The programmatic level analysis includes:

- 3) **Completeness**- Determination of whether the electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

Energy Safety synthesizes the initiative and programmatic analyses to formulate the conclusion regarding substantial compliance with the substantial portion of the vegetation management requirement in Liberty's WMP, which is described in Section 4.

¹⁰ Pub. Util. Code, § 8386.3(c)(5)(C).

3.1 Initiative Level Assessment

Summary of Initiative Level Compliance

Table 1. includes the five initiatives from Liberty's 2023-2025 WMP for which Energy Safety's 2023 SVM Audit found that Liberty did not complete all work.

The 2023 SVM Audit found that Liberty performed all work in eight of the thirteen initiatives and was deficient in the remaining five. Table 1 below is reproduced from Energy Safety's 2023 SVM Audit. The table includes Energy Safety's determination of substantial compliance for each initiative based on the analysis below. Energy Safety found that Liberty substantially complied with four out of the five deficient initiatives.

Table 2. Liberty 2023 SVM Audit Findings and Determination of Substantial Compliance

Vegetation Management Initiative with Deficiency	Determination of Substantial Compliance
8.2.3.4 Fall-in Mitigation	Substantially Complied
8.2.3.5 Substation Defensible Space	Substantially Complied
8.2.3.6 High-Risk Species	Substantially Complied
8.2.5 Quality Assurance and Quality Control	Substantially Complied
8.2.6 Open Work Orders	Did not substantially comply

8.2.3.4 Fall-in Mitigation

Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”¹¹ Liberty’s 2023 WMP included a quantitative target to conduct routine maintenance projects for fall-in mitigation along a minimum of 220 circuit miles and narrative commitments to mitigate fall-in risks identified during patrol inspections and LiDAR inspections, and associated with its Hazard Tree Management Plan.¹²

2023 SVM Audit Finding

Liberty provided documentation to demonstrate that it met its quantitative target for fall-in mitigation by conducting 64 maintenance projects along 375 circuit miles; however, Energy Safety identified inconsistencies in work completion associated with the inspection and removal of tree hazards which suggested that not all vegetation threats were mitigated.¹³ Several of the files Liberty provided contained conflicting information about the number of trees identified as hazards and the extent of the mitigation work completed. For example, Liberty provided an Excel file which identified 4,083 potential grow-in or fall-in threats identified along the 702 circuit miles inspected by LiDAR, but only 1,799 (44%) of these had completion dates.¹⁴ Similarly, Liberty provided an Excel file of its ground-based inspections work which identified 5,626 vegetation compliance issues, of which 4,349 (77%) showed completion dates.¹⁵ Finally, Liberty provided Excel files associated with its Hazard Tree Management Plan work which documented 2,881 trees within the utility strike zone expected to pose a risk to Liberty’s infrastructure and the priority level of each tree, but did not clarify how these trees related to other inspection or mitigation efforts.¹⁶ Due to inconsistencies between the trees identified as hazardous and those documented as mitigated, Liberty was

¹¹ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

¹² [Liberty's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true) (Rev. #3, Feb. 15, 2024), p. 223-229 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true).

¹³ [Energy Safety's 2023 SVM Audit of Liberty](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true), p.A10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true).

¹⁴ Data Request 272, Question 2; attachment: “Req 2 LiDAR Inspections.csv.”

¹⁵ Data Request 272, Question 1; attachment: “Req 1 Ground Inspections.csv.”

¹⁶ Data Request 272, Question 7; attachment: “Req 7 Fall In Mitigation P1.csv,” Question 8; attachment: “Req 8 Fall In Mitigation P2.csv,” Question 9; attachment: “Req 9 Fall In Mitigation P3.csv,” Question 10; attachment: “Req 10 Fall In Mitigation P4.csv.”

unable to demonstrate its completion of all work associated with initiative 8.2.3.4 Fall-In Mitigation.¹⁷

Liberty's CAP Response

In its CAP, Liberty explained that fall-in mitigation work was assigned during its detailed and patrol inspections and that the LiDAR and ground-based inspections are used to identify work for several projects, including but not limited to fall-in mitigation. Liberty further clarified that some of the records in the LiDAR and ground-based inspection do not have a "completion date" because those records refer to on-going monitoring of trees that do not yet meet the criteria for mitigation. Liberty provided an updated spreadsheet which more clearly defined the fall-in mitigation work assigned during its detailed and patrol inspections, which included line items for all locations where a fall-in risk was identified, whether the risk was identified during a detailed or patrol inspection, the priority category of the tree based on the strike risk the vegetation posed to infrastructure (P1 in which vegetation is in contact with or expected to imminently fail and contact infrastructure, P2 in which vegetation is not a P1 but will likely fail within 6 months, P3 in which vegetation is not a P2 but is expected to fail within 2 years, and P4 in which vegetation is currently stable but may be in decline but is not expected to fail), the date the work order was created, and the date it was completed.¹⁸ Liberty demonstrated that either all work associated with fall-in mitigation was completed, or that monitoring of future strike risk has been ordered (as is the case for priority 4 trees) with the information in this file.

Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

Criteria 1: Achievement of Objective

Energy Safety compared the Excel file Liberty sent in its CAP response to the data Liberty provided for the SVM audit in response to data request 272 (DR-272). While the Excel files provided in response to DR-272 were unclear as to what constituted a vegetation threat and how those records should be interpreted,^{19, 20} the updated file provided clarity as to what locations were to be mitigated for fall-in risk and how that risk was identified and prioritized. Based on the updated file, Liberty recorded 2,880 work orders in 2023 identifying fall-in vegetation threats, of which required,¹⁹ and one labeled as 'Wood Hauling Required' with a

¹⁷ [Energy Safety's 2023 SVM Audit of Liberty](#), p.A10

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true>).

¹⁸ 2023_SVM_Audit_Liberty Response Fall-In Mitigation Completed Work.xls

¹⁹ Data Request 272, Question 1; attachment: "Req 1 Ground Inspections.csv."

²⁰ Data Request 272, Question 2; attachment: "Req 2 LiDAR Inspections.csv."

complete date. However, five of the completed work orders (<1%) did not have a completion work date and six completed work orders (<1%) were not mitigated until the following year (2024).

In its 2023 SVM Audit, Energy Safety found that Liberty achieved its quantitative target to conduct routine maintenance projects for fall-in mitigation along a minimum of 220 circuit miles. In its CAP, Liberty also provided an updated data file demonstrating completion of 2,869 out of 2,880 (>99%) work orders that identified fall-in vegetation threats during its detailed and patrol inspections in 2023. Therefore, Liberty achieved the objective of the initiative.

Criteria 2: Good Faith Effort

Liberty provided documentation demonstrating it completed its target of maintenance projects along its target of 220 circuit miles and completed 2,869 (99%) of the fall-in mitigation work orders identified during its detailed and patrol inspections in compliance year 2023. Therefore, Energy Safety found that Liberty made a good faith effort to complete work associated with the Fall-In Mitigation initiative.

Initiative Level Determination

In its CAP, Liberty provided clarity on how it utilizes its detailed, patrol, LiDAR, and ground-based inspections to assign vegetation management work for its various projects. Additionally, Liberty provided an updated Excel file which demonstrated completion of the majority of work for the fall-in mitigation initiative. Energy Safety notes that vegetation hazards identified during any inspection must be mitigated under one of the Vegetation Fuels Management initiatives (e.g., pole clearing, clearance, fall-in mitigation, hazardous species). Therefore, any hazardous trees identified in 2023 whether through LiDAR, ground-based inspections, or other methods are eligible for evaluation under this initiative and Audit. However, Energy Safety recognizes that inspections may record potential future hazards that may not need work but should be monitored. Thus, Energy Safety accepts Liberty's explanation for the discrepancies in the data files submitted in response to DR 272 as the updated file (sent with the CAP) demonstrates Liberty substantially complied with this initiative.

In the SVM Audit, Energy Safety identified inconsistencies in datasets submitted to support completion of inspections and vegetation fuels management, which led to the initial audit findings. These inconsistencies could have been initially resolved with additional explanation in Liberty's data request response or if the Excel files had been accompanied by meta-data. Therefore, Energy Safety requests that Liberty provide such documentation in future data request responses to avoid confusion in future.

8.2.3.5 Substation Defensible Space

Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”²¹ In its 2023-2025 WMP, Liberty committed to perform routine inspections, vegetation management, and other maintenance activities at all 12 substations a minimum of twice per year.²²

2023 SVM Audit Finding

Liberty provided Excel files, images, and spatial QDR data documenting the inspections and maintenance activities performed at its substations in 2023.^{23, 24} According to this documentation, Liberty inspected and treated, when treatment was necessary, all 12 substations with chemical, mechanical, and/or pre-emergent chemical treatments in June of 2023, but only provided documentation demonstrating that work was completed at 10 of the 12 substations in October of 2023.²⁵ Liberty stated that the Stampede and Portola substations were not inspected a second time (in October) due to maintenance and construction activities performed at these substations in the fall of 2023; however, Liberty did not provide details on why the construction activities would have prevented vegetation management work at those two substations.²⁶ Consequently, Liberty did not provide information consistent with the completion of work identified in initiative 8.2.3.5 Substation Defensible Space.

Liberty's CAP Response

In its CAP, Liberty stated that it “successfully inspected and performed necessary work on all 12 substations in 2023...While two site visits were implemented for most substations, the Portola and Stampede substations had only one site visit each due to restricted access during substation rebuild construction activities. These substations resumed normal maintenance cycles post-construction.”²⁷ However Liberty's CAP did not include information to support that maintenance activities were not needed during construction.

²¹ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-12 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²² [Liberty's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true) (Rev. #3, Feb. 15, 2024), p. 233

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true>).

²³ Liberty's geospatial 2023 quarter 1-4 Quarterly Data Report (QDR), Liberty Asset Inspection Point, 8.1.3.6. and Liberty's Quarterly Data Report (QDR) for Fourth Quarter 2023, submitted on April 4, 2024, Table 1.

²⁴ Data Request 272, Question 11; attachment: “2023 Substation Treatments.xlsx.”

²⁵ Data Request 315, Question 3; attachment: “2023 Substation Treatment.xlsx.”

²⁶ Data Request 298, Question 1; attachment: “Liberty's Response to Energy Safety-DR-298_12182024.pdf.”

²⁷ [Liberty's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

Criteria 1: Achievement of Objective

In its CAP, Liberty stated that it was unable to complete a second round of inspection and/or mitigation work at the Stampede and Portola substations due to restricted access constraints from construction. Although Liberty was unable to meet its WMP commitment to complete a minimum of two site visits at the Stampede and Portola substations in 2023, Liberty was able to complete 22 out of a total of 24 substation inspections for the year and provided documentation stating that the fall inspections were not completed due to construction activities at the Portola and Stampede substations. Energy Safety finds it reasonable that construction at these substations would eliminate the need for defensible space inspections. However, Liberty did not provide a justification for why this should be so, despite Energy Safety's request for this information in the 2023 SVM Audit. Energy Safety expects Liberty to provide explanations for incomplete WMP commitments in future data submittals. However, because Liberty completed 22 of its substation defensible space inspections and demonstrated the construction occurred during the time period of the second inspection at two of its substations, Energy Safety finds that it achieved the objective of this initiative.

Criteria 2: Good Faith Effort

Liberty completed 22 of 24 of its substation inspections and provided documentation to demonstrate that it did not complete a second vegetation management inspection at two of its substations due to construction activities. Therefore, Liberty made a good faith effort to complete the work associated with this initiative.

Initiative Level Determination

The documentation provided by Liberty demonstrated that it achieved the objective of the initiative and made a good faith effort to complete the work. Therefore, Energy Safety finds that Liberty substantially complied with this initiative.

8.2.3.6 High-Risk Species

The purpose of this initiative is to take actions "to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation."²⁸ Liberty's 2023-2025 WMP states that "Liberty's methodology of addressing high-risk species does not differ from that

²⁸ [Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

described in initiative 8.2.3.4, Fall-In Mitigation.”²⁹ Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.³⁰ Energy Safety found that Liberty substantially complied with both its Fall-In Mitigation and High Risk Species initiatives based on the rationale presented in Fall In-Mitigation above.

8.2.5 Quality Assurance and Quality Control

Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to describe the “Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”³¹ Liberty’s 2023-2025 WMP included a detailed quality assurance and quality control plan outlining targets for the number of circuit miles which would receive quality control checks and the high pass rates vegetation management activities included in its completed tree work, detailed pre-inspections, hazard tree work, and pole clearing.³² Liberty also included two narrative commitments to conduct quality control reviews of work completed and post work verification.

2023 SVM Audit Finding

As a part of the 2023 SVM Audit, Liberty provided information which demonstrated that it completed all of the QA/QC activities and commitments, but did not meet all of its targeted pass rates. In its 2023 SVM audit, Energy Safety acknowledged the comprehensiveness of Liberty’s QA/QC program and the high target pass rates for vegetation management activities. Liberty provided quantitative targets for both QC checks for various vegetation management activities as well as target pass rates for these QC activities. Liberty exceeded its completed tree work target (completing QC checks on 300 circuit miles compared to the 229 target), detailed pre-inspections (completing QC checks 124 circuit miles compared to the target of 77), hazard tree work (completing QC checks on 654 trees compared to the target of 524), and pole clearing (completing QC checks on 748 poles compared to the target of 585). Liberty also completed its QC reviews and post-work verifications as described in its narrative

²⁹ [Liberty’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true) (Rev. #3, Feb. 15, 2024), p. 234

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true>).

³⁰ [Energy Safety’s 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-13 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

³¹ [Energy Safety’s 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

³² [Energy Safety’s 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-20 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

commitments. However, in its 2023-2025 WMP, Liberty committed to achieving high pass rates (97-99%) for all vegetation management activities in its QA/QC program. The SVM audit found that Liberty did not achieve these pass rates for three of the three completed tree work activities (actual pass rates were 92-96%), four of the five detailed inspection activities (actual pass rates were 95-99%), four out of the five hazard tree work activities (actual pass rates were 93-100%), and six out of nine pole clearing activities (actual pass rates were 84-100%). While pass rates were generally high for all activities, Liberty did not achieve the commitments described in its WMP and therefore did not complete all work identified in initiative 8.2.5 Quality Assurance and Quality Control.

Liberty's CAP Response

Liberty stated that it met its quantitative targets for its QA/QC program and “places a high value on work quality in its Vegetation Management Program.”³³ Liberty explained that the pass rates were set as internal goals for measuring work quality, stating that “Liberty reviews all QC findings and assigns vegetation management crews to perform rework for QC failures where applicable. Liberty’s post-work verification process operates as intended to complete all work to Liberty standards and specifications. The pass rate target is Liberty’s work quality goal, and not a measurement of work completed.”³⁴

Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

Criteria 1: Achievement of Objective

In the SVM Audit, Energy Safety found that Liberty achieved or exceeded its quantitative QC assessment target for QC verification along its circuit miles for completed tree work, detailed pre-inspections, hazard tree work, and pole clearing, but failed to achieve the target pass rates outlined in Table 8-20 of Liberty’s 2023-2025 WMP.³⁵ Energy Safety found that while Liberty did not achieve the pass rates in its WMP, the pass rates it did achieve demonstrated high-quality work consistent with the objective of the QA/QC initiative. Therefore, Energy Safety found that Liberty completed the majority of the work and achieved the objective of the quality assurance and quality control initiative.

Criteria 2: Good Faith Effort

³³ [Liberty's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 4
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

³⁴ [Liberty's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 4
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

³⁵ [Energy Safety's 2023 SVM Audit of Liberty](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true), p. A12-13
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true>).

Liberty's 2023-2025 WMP described a comprehensive QA/QC program and in compliance year 2023, Liberty demonstrated that it surpassed its quantitative QC assessment targets for verification work along its circuit miles. Although Liberty did not achieve the targeted pass rates, Energy Safety appreciates that Liberty's pass rates were high (between 97% and 99%) for all the components of its QA/QC program. These high pass rates as well as Liberty's near achievement of them demonstrate its commitment to performing high quality vegetation management work. Overall, Liberty demonstrated that it made a good faith effort to complete all work associated with this initiative.

Initiative Level Determination

Liberty exceeded its targets for QC work along its circuit miles and achieved high pass rates for all of the components of its QA/QC program, demonstrating its commitment to its QA/QC program. Therefore, Energy Safety finds that Liberty substantially complied with this initiative.

Energy Safety acknowledges that Liberty's QA/QC program is robust and comprehensive, including both QA assessment targets and pass rates for each component of its SVM program, and could serve as a model for quality assurance for other utilities.

8.2.5 Open Work Orders

Summary of Initiative Work Commitments and Activities

The purpose of this initiative is to describe the "Actions taken to manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities."³⁶ Liberty's WMP stated that it prioritizes trees for mitigation based on risk and included four narrative commitments describing the targeted timeframes for when each Priority 1 (P1), Priority 2 (P2), and Priority 3 (P3) tree would be mitigated.

2023 SVM Audit Finding

Liberty did not complete all mitigation work on P1, P2, and P3 trees within the timeframes specified in its WMP. Liberty provided Excel files listing all P1, P2, P3, and P4 trees identified in 2023. These files demonstrated that: of the two P1 trees, one was mitigated outside of the 24-hour timeframe; of the 45 P2 trees, 30 were mitigated outside the 30-day timeframe; and of the 2,522 P3 trees, 47 were mitigated outside 270 days. Ultimately, Liberty mitigated all P1 and P2 work orders within 2023 and all but 30 of the P3 work orders had work completion

³⁶ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-26 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

dates beyond the 2023 annual compliance period. While the P1 and P2 trees were ultimately mitigated shortly after the designated timeframes, Liberty did not remediate the P1, P2, and P3 trees within the risk based timeframes outlined in the WMP nor did they remediate 30 P3 trees as of (October 28, 2024), Energy Safety found that Liberty did not supply information consistent with completion of work identified in Initiative 8.2.6 Open Work Orders.³⁷

Liberty's CAP Response

In its CAP, Liberty disagreed with Energy Safety's finding, stating that it provided data displaying work orders categorized by priority, the date created, and the date completed as requested in DR 272, Questions 7 through 10. Liberty stated that 69 out of 2,882 (2%) work orders (2% of the total) were completed outside of Liberty's mitigation timelines; however, this number is different from the total calculated by Energy Safety (78 out of 2,568; 3%; P1, P2, and P3 work orders). Liberty referred to Section 8.2.6 of its 2023-2025 WMP, in which it explains there are some circumstances where the timeline for mitigation cannot be met, and how Liberty manages those circumstances. Liberty did not provide any documentation describing circumstances where the timeline could not be met. As a corrective action, Liberty stated that it "has implemented a tracking mechanism to alert vegetation management managers when work orders are approaching their due dates to manage work order completion. Liberty continues to manage open work orders to perform the remediation as described in its WMP."³⁸

Criteria 1: Achievement of Objective

Liberty met 2,490 of its 2,568 (96%) of its priority 1, 2, and 3 work order timeline targets within the 2023 compliance year, falling short by 78 (3%) of open work orders. While Liberty completed the majority of the work and attributed the missed targets to various constraints such as "outage requests, engineering requests, specialized equipment procurement, coordination with landowners, permitting, refusal resolution, emergency work, etc.,"³⁹ the provided explanations lacked sufficient detail to fully account for the 78 missed priority tree targets. According to Liberty's commitment outlined in its 2023 WMP, "Liberty adheres to the mitigation timelines it has identified for completing vegetation work orders. Liberty develops an annual vegetation work plan and intends to complete all applicable work orders for the current maintenance cycle and work plan."⁴⁰ Given this commitment, the shortfall of 78 open

³⁷ [Energy Safety's 2023 SVM Audit of Liberty](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true), p. A27-A28

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true>).

³⁸ [Liberty's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), pp.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

³⁹ [Liberty's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true) (Rev. #3, Feb. 15, 2024), p. 249

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true>).

⁴⁰ [Liberty's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true) (Rev. #3, Feb. 15, 2024), p. 249

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true>).

work orders indicates that Liberty did not achieve its objective for the Open Work Order initiative in the 2023 compliance year.

Criteria 2: Good Faith Effort

As noted above, Liberty completed the majority of its commitment to mitigate all priority trees and has “implemented a tracking mechanism to alert vegetation management managers when work orders are approaching their due dates to manage work order completion.”⁴¹ However, Liberty did not provide sufficient information to demonstrate that it properly recorded why the 78 work orders were not completed within the 24 hour, 30 day, or 9 month (or 270 days) timeframes. Therefore, Energy Safety concludes that Liberty did not make a good faith effort to manage its work orders.

Initiative Level Determination

The information provided by Liberty demonstrated that it completed mitigation work for all of its P1 and P2, and all but 30 of its P3 work orders. However, Liberty did not meet the specified time frame for 1 P1 work order (50%), 30 P2 work orders (67%), and 47 P3 work orders (2%) and it did not specify why the targeted mitigation timeframes were not met.

Energy Safety recognizes that completion of work orders may be constrained by situations outside of Liberty’s control. Energy Safety requests that Liberty provide details in future data submittals regarding those constraints and how Liberty works to resolve them to inform the audit.

The timeframes established for mitigation are based on the relative risk posed by the vegetation and must be achieved to meet the overall objective of the WMP to reduce risk of wildfire ignition. Therefore, Energy Safety finds that Liberty did not substantially comply with initiative 8.2.6 Open Work Orders.

⁴¹ [Liberty’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p.5
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

3.2 Programmatic Assessment

Energy Safety's SVM Audit, dated April 2, 2025, found that Liberty completed all work in eight of the 13 initiatives in its 2023-2025 WMP for compliance year 2023 and was unable to provide sufficient documentation to demonstrate that all work was completed for five initiatives. Liberty's CAP, received May 5, 2025, provided sufficient documentation to demonstrate substantial compliance for four of the five initiatives identified in the SVM Audit. However, Liberty did not provide sufficient documentation demonstrating it completed all work associated with its Open Work Orders Initiative.

Energy Safety's 2023 SVM Audit identified recordkeeping and planning issues within several of Liberty's vegetation management programs led to the initial audit findings and required corrective actions. Energy Safety expects Liberty to track its P1, P2, and P3 work orders and verify that work is completed in an efficient and timely manner. Liberty should also develop practices to record constraints which result in delays to work orders. Recordkeeping and insufficient information have been identified in previous SVM Audits, (e.g., Substation Vegetation Management, Detailed Inspections and Management, and Identification and Remediation of "At-Risk Species in the 2022 SVM Audit"⁴²), which suggests that accurate recordkeeping is a persistent problem for Liberty and an area for growth. Energy Safety expects Liberty to continue to mature its vegetation management programs and better document its activities so it can ensure it is meeting WMP objectives.

Energy Safety supports the corrective actions Liberty detailed in its CAP to address the recordkeeping deficiencies identified in its Open Work Order and Fall-In Mitigation programs and will assess performance in future compliance years. Energy Safety also expects Liberty to provide all requested information and detailed metadata in response to future Energy Safety data requests.

Despite these deficiencies, Energy Safety finds that Liberty has completed the majority of the work described in 2023-2025 WMP and where it has fallen short, Liberty has identified deficiencies in timely completion of its P1, P2, and P3 priority work orders and taken actions to correct these deficiencies. Therefore, Energy Safety finds that programmatically, Liberty substantially complied with the work described in its 2023-2025 WMP for compliance year 2023.

⁴² 2022 Substantial Vegetation Management Audit Liberty.
(<https://efiling.energysafety.ca.gov/Search.aspx?docket=2022SVM>, accessed August 13, 2024).

4. Conclusion

Based upon the analysis discussed in Section 3, Energy Safety concludes that Liberty substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

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