



December 22, 2025

Dan Marsh
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Liberty Utilities
701 National Avenue
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NOTICE OF DATA INACCURACY

Mr. Marsh:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Liberty Utilities (LU) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a data inaccuracy. Energy Safety therefore issues LU a Notice of Data Inaccuracy (NODI). Failure to remedy this data inaccuracy may lead to a Notice of Non-Performance (NON) if the inaccuracy causes LU to miss a WMP target or prevents Energy Safety from ensuring that LU performed the targets and statements made in LU 2024 WMP.

On May 6, 2025, Energy Safety conducted an inspection of Liberty Utilities' WMP initiatives in the vicinity of the city of Carnelian Bay, California. The inspection report is enclosed herewith. Energy Safety found the following data inaccuracies:

Data Inaccuracy 1. On Pole ID 294360, Grid Hardening ID cd332a4e-d5bf-42c4-8129-e19af875a431 at coordinates 39.2060393400902, -120.094931099953, the inspector observed that LU failed to adhere to data accuracy.

The data inaccuracy identified in this notice could make it appear as though LU reached the target set in WMP initiative Distribution pole replacements and reinforcements, when it has not. If LU does not address this data inaccuracy and includes the inaccurate data in LU's reporting regarding WMP initiative 8.1.2.3 - Distribution pole replacements and reinforcements, LU may be found to fail to achieve the target for that WMP initiative. This failure may be raised in a future NON or in Energy Safety's 2024 Annual Report on LU's WMP Performance.

Within 30 days from the issuance date of this NODI, LU should provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified data inaccuracy or inaccuracies.

This response shall be filed in the Energy Safety e-Filing system under the 2024 NODI Docket¹ and the associated file name(s) must begin with the NODI identification number.

Sincerely,



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Cc:

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¹ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NODI>



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Gavin Newsom, Governor
Caroline Thomas Jacobs, Director

INSPECTION REPORT

Electrical Corporation:	Liberty Utilities
Report Number:	CAD_LU_BKA_20250506_1533
Date of inspection:	May 6, 2025
City and/or County of Inspection:	Carnelian Bay, Placer County
Inspector:	Babak Kaviani
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.3 - Distribution pole replacements and reinforcements
Inspection Purpose:	Assess the accuracy of Liberty Utilities' QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

WMP Inspection Data Inaccuracies

Data Inaccuracy #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Data Inaccuracy Description
Data Inaccuracy 1	294360	cd332a4e-d5bf-42c4-8129-e19af875a431	39.2060393400902, -120.094931099953	Tier 2	8.1.2.3 - Distribution pole replacements and reinforcements	Inaccurate data provided on distribution pole replacement and reinforcement.

Observations

Data Inaccuracy 1

Finding:

On Pole ID 294360, Grid Hardening ID cd332a4e-d5bf-42c4-8129-e19af875a431 at 3925 N Lake Blvd, Carnelian Bay, CA, 96140, USA, 39.2060393400902, -120.094931099953, the inspector observed that that a new pole was installed at this location. The inspector's observation is documented in Data Inaccuracy 1 photographs, which are attached to this report as photo numbers Item1GIImg1, Item1IA1Img1, and Item1IA1Img2. In the 2024 Q4 Quarterly Data Report submission, LU reported that work on WMP initiative 8.1.2.3 - Distribution pole replacements and reinforcements were completed at this location On Pole ID 294360, Grid Hardening ID cd332a4e-d5bf-42c4-8129-e19af875a431.

Energy Safety concludes that there is inaccurate data because of these facts:

1. The foreman of the construction crew building the new house fed by the subject pole stated that the pole was installed recently and that he had requested the weatherhead installation when the pole was set.
2. There was no existing distribution pole at this point to replace or reinforce.
3. A new distribution pole was installed.

This observation indicates that the data regarding pole replacement and reinforcement was not accurate. Failure to rectify this data inaccuracy prior to the submission of any performance assessments, such as annual reports, may result in a notice of non-performance.

Exhibits

Exhibit A: Photo Log

Structure ID: 294360

Data Inaccuracy 1

	
<p>Item1GImg1: Overall pole</p>	<p>Item1GImg2: Pole ID</p>



Item1IA1Img1: Pole connection. Weatherhead is missing



Item1IA1Img2: Secondary connection from the transformer on the pole across the street