



December 22, 2025

Dan Marsh
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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 2025 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 prior to the submission of LU's 2025 Annual Implementation Report 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 2025 WMP.

On September 23, 2025, Energy Safety conducted an inspection of Liberty Utilities' WMP initiatives in the vicinity of the city of Coleville, California. The inspection report is enclosed herewith. Energy Safety found the following data inaccuracies:

Data Inaccuracy 1. On Pole ID 300302, Grid Hardening ID 21bc2383-892d-417e-9302-876fad1b6305 at coordinates 38.5159677796637, -119.472614, 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 8.1.2.3 - 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 2025 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 2025 NODI Docket¹ and the associated file name(s) must begin with the NODI identification number.

Sincerely,

Patrick Doherty

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¹ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NODI>



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Gavin Newsom, Governor
Caroline Thomas Jacobs, Director

INSPECTION REPORT

Electrical Corporation:	Liberty Utilities
Report Number:	CAD_LU_BKA_20250923_1509
Date of inspection:	September 23, 2025
City and/or County of Inspection:	Coleville, Mono County
Inspector:	Babak Kaviani
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 1 (Q1)
Inspection Selection:	Energy Safety viewed the contents of the Q1 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	300302	21bc2383-892d-417e-9302-876fad1b6305	38.5159677796637, -119.472614	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 300302, Grid Hardening ID 21bc2383-892d-417e-9302-876fad1b6305 at 114 W Mill Creek Ln, Coleville, CA, 96107, USA, 38.5159677796637, -119.472614, the inspector observed 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 Exhibit A. In the 2025 Q1 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 300302, Grid Hardening ID 21bc2383-892d-417e-9302-876fad1b6305.

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

1. No pre-existing distribution pole was identified at this location that would require replacement or reinforcement.
2. Inspection findings indicate a newly installed distribution pole functioning as a service drop pole between an existing distribution pole and an existing residential structure.

This observation indicates 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: 300302

Data Inaccuracy 1

	
GImg1: Overall Structure	GImg2: Pole ID



GImg3: Older pole and pole ID that was not replaced or reinforced

IA1Img1: Overall area