



Liberty
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January 9, 2026

VIA OEIS E-FILING

Sheryl Bilbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Docket #2025 NON

Subject: Liberty's Response to Notice of Non-Performance –
NON_ESD_LU_AKM_20251124_1309

Dear Sheryl Bilbrey:

Liberty Utilities (CalPeco Electric) LLC (“Liberty”) appreciates the opportunity to provide this response to the finding(s) identified in the “NON_ESD_LU_AKM_20251124_1309” (Notice of Non-Performance or NON), issued by the Office of Energy Infrastructure Safety (“Energy Safety”) on December 10, 2025, regarding Energy Safety’s inspection of work completed by Liberty in accordance with its 2025 Wildfire Mitigation Plan (“WMP”). Liberty also appreciates Energy Safety’s continued efforts to identify, communicate, and resolve wildfire risks throughout California.

The enclosed response demonstrates that Liberty completed a corrective action on December 18, 2025 and no further work is required by Liberty at this time related to the Energy Safety findings identified in the above identified notice.

If you have any questions or require any additional information, please contact me at:

Jordan Parrillo
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Liberty Response

Energy Safety Finding: Energy Safety found a “Moderate” Adherence to Protocol defect at WMP-VM-VFM-01 at pole ID 293554 in HFTD Tier 2. Liberty did not perform its Pole Clearing program (WMP initiative number 8.2.3.1) as required in the WMP and Section 4.1.3 in Liberty’s Vegetation Management Plan, VM-02 Ver.3. This resulted in dry Russian thistle and yellow rabbitbrush vegetation present within 10-foot radius and 8-foot height clearance requirement of the pole.

Notice	Deficiency #	Location
NON_ESD_LU_AKM_20251124_1309	Deficiency 1	Coordinates 38.541024, -119.498249

Summary of Energy Safety Findings¹:

Specifically, the NON describes that on November 24, 2025, Energy Safety conducted an inspection of Liberty’s WMP initiatives in the vicinity of the city of Coleville, California in High Fire Threat District (HFTD) Tier 2, and found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.3.1 Pole Clearing, Liberty failed to adhere to its protocol at pole ID 293554 near coordinates 38.541024, -119.498249, Vegetation Management ID e1060d7d-ec21-420e-893e-4a3507331842. Energy Safety considers this non-performance to be in the Moderate risk category. Liberty must complete a corrective action for this non-performance by six months from date of this notice.

Liberty Response:

Regarding Vegetation Management ID e1060d7d-ec21-420e-893e-4a3507331842, Liberty sent a crew to clear the pole (Pole ID 293554) identified in NON_ESD_LU_AKM_20251124_1309. Liberty completed its corrective action on December 18, 2025. The images below capture the subject pole before and after corrective action was completed.

¹ Energy Safety NON_ESD_LU_AKM_20251124_1309

Picture 1: Pole ID 293554
(before corrective action completed on December 18, 2025)



Picture 2: Pole ID 293554
(before corrective action completed on December 18, 2025)



Picture 3: Pole ID 293554
(after corrective action completed on December 18, 2025)



Picture 4: Pole ID 293554
(after corrective action completed on December 18, 2025)

