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***VIA OEIS E-FILING***

Patrick Doherty  
Program Manager, Compliance Assurance Division  
Office of Energy Infrastructure Safety  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Docket #2025 NODI

**Subject:** Liberty's Response to Notice of Data Inaccuracy –  
NODI\_CAD\_LU\_BKA\_20250923\_1509

Dear Patrick Doherty:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to provide this response to the finding(s) identified in the "NODI\_CAD\_LU\_BKA\_20250923\_1509" (Notice of Data Inaccuracy or NODI), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on December 22, 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 is in compliance with its 2025 target for its 2025 WMP initiative 8.1.2.3 - Distribution pole replacements and reinforcements 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:

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### Liberty Response

**Energy Safety Finding:** Energy Safety observed that in implementing the 2025 WMP initiative 8.1.2.3 - Distribution pole replacements and reinforcements, Liberty failed to adhere to data accuracy on Pole ID 300302, Grid Hardening ID 21bc2383-892d-417e-9302-876fad1b6305 at coordinates 38.5159677796637, -119.472614.

Notice	Data Inaccuracy #	Location
NODI_CAD_LU_BKA_20250923_1509	Data Inaccuracy 1	Coordinates 38.5159677796637, -119.472614

### Summary of Energy Safety Findings<sup>1</sup>:

Specifically, the NODI describes that on September 23, 2025, Energy Safety conducted an inspection of Liberty's WMP initiatives in the vicinity of the city of Coleville, California, and found the following data inaccuracies:

Deficiency 1. 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. Energy Safety concludes that there is inaccurate data because no pre-existing distribution pole was identified at this location that would require replacement or reinforcement and because the inspection findings indicate a newly installed distribution pole functioning as a service drop pole between an existing distribution pole and an existing residential structure.

### Liberty Response:

Liberty's 2025 WMP initiative 8.1.2.3 - Distribution pole replacements and reinforcements captures new pole installments as part of the work completed in this WMP initiative. In Section 8.2.3 of its 2026-2028 WMP, Liberty clarifies that in addition to condition-based pole replacements, Liberty proactively replaces poles as part of other projects.<sup>2</sup> Liberty acknowledges that reporting these types of new pole installments as part of its 2025 WMP initiative 8.1.2.3 was not specified in its 2023-2025 WMP and thus understands the Energy Safety observation and finding identified in NODI\_CAD\_LU\_BKA\_20250923\_1509.

Energy Safety's findings for NODI\_CAD\_LU\_BKA\_20250923\_1509, and another similar Energy Safety NODI received on December 22, 2025 for Liberty's 2025 WMP initiative 8.1.2.3,<sup>3</sup> do not impact Liberty's compliance with its 2025 WMP target for 2025 WMP initiative 8.1.2.3. In 2025, Liberty completed 1,038 pole replacements as part of its 2025 WMP initiative 8.1.2.3, exceeding its target of 400 poles. Of those 1,038 poles reported, 857 poles replaced old poles and 181 poles were new pole installments not replacing old poles.

<sup>1</sup> Energy Safety NODI\_CAD\_LU\_BKA\_20250923\_1509

<sup>2</sup> Liberty 2026-2028 Base WMP\_R1; page 125

<sup>3</sup> Energy Safety NODI\_CAD\_LU\_CYA\_20250924\_1108