January 21, 2026

VIA OEIS E-FILING

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

Docket #2024 NODI

Subject: Liberty's Response to Notice of Data Inaccuracy – Energy Safety
NODI_CAD_LU_CYA_20250507_1252

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_CYA_20250507_1252" (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 2024 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 2024 target for its 2024 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:

Jordan Parrillo
Manager of Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
701 National Ave,
Tahoe Vista, CA 96148
Telephone: 530-721-7818
jordan.parrilo@libertyutilities.com

Liberty Response

Energy Safety Finding: Energy Safety observed that in implementing the 2024 WMP initiative 8.1.2.3 - Distribution pole replacements and reinforcements, Liberty failed to adhere to data accuracy on Pole ID 294360, Grid Hardening ID cd332a4e-d5bf-42c4-8129-e19af875a431 at coordinates 39.2060393400902, -120.094931099953.

Notice	Data Inaccuracy #	Location
NODI_CAD_LU_CYA_20250507_1252	Data Inaccuracy 1	Coordinates 39.2060393400902, -120.094931099953

Summary of Energy Safety Findings[1]:

Specifically, the NODI describes that on May 7, 2025, Energy Safety conducted an inspection of Liberty's WMP initiatives in the vicinity of the city of Tahoma, California, and found the following data inaccuracies:

> Deficiency 1. On Pole ID 294397, Grid Hardening ID 61c86ed2-76b7-480f-95ed-d0b3022e780d at 7231 8th Ave, Tahoma, CA, 96142, USA, 39.0593325099474, -120.131907314726, the inspector observed that a new pole was installed at this location. Energy Safety concludes that there is inaccurate data because there was no existing distribution pole at this point to replace or reinforce, a new distribution pole was installed, and nearby residents stated that the pole was installed within the last year.

Liberty Response:

Liberty's 2024 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.[2] Liberty acknowledges that reporting these types of new pole installments as part of its 2024 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_CYA_20250507_1252.

Energy Safety's findings for NODI_CAD_LU_CYA_20250507_1252, and another similar Energy Safety NODI received on December 22, 2025 for Liberty's 2024 WMP initiative 8.1.2.3,[3] do not impact Liberty's compliance with its 2024 WMP target for 2024 WMP initiative 8.1.2.3. In 2024, Liberty completed 823 pole replacements as part of its 2024 WMP initiative 8.1.2.3, exceeding its target of 400 poles. Of those 823 poles reported, 695 poles replaced old poles and 128 poles were new pole installments not replacing old poles.

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[1] Energy Safety NODI_CAD_LU_CYA_20250507_1252
[2] Liberty 2026-2028 Base WMP_R1; page 125
[3] Energy Safety NODI_CAD_LU_BKA_20250506_1533