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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 –
NODI_CAD_LU_BKA_20250506_1533

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_20250506_1533” (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:

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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_BKA_20250506_1533	Data Inaccuracy 1	Coordinates 39.2060393400902, -120.094931099953

Summary of Energy Safety Findings¹:

Specifically, the NODI describes that on May 6, 2025, Energy Safety conducted an inspection of Liberty's WMP initiatives in the vicinity of the city of Carnelian Bay, California, and found the following data inaccuracies:

Deficiency 1. 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. Energy Safety concludes that there is inaccurate data because 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, because there was no existing distribution pole at this point to replace or reinforce, and because a new distribution pole was installed.

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_BKA_20250506_1533.

Energy Safety's findings for NODI_CAD_LU_BKA_20250506_1533, 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

¹ Energy Safety NODI_CAD_LU_BKA_20250506_1533

² Liberty 2026-2028 Base WMP_R1; page 125

³ Energy Safety NODI_CAD_LU_CYA_20250507_1252

128 poles were new pole installments not replacing old poles.