



February 3, 2026

To: Liberty Utilities
Dan Marsh
Senior Manager, Rates and Regulatory Affairs
Liberty Utilities
701 National Avenue
Tahoe Vista, CA 96148

SUBJECT: Liberty Utilities' (Liberty) 2024 Vegetation Management Audit (VMA) Report

Pursuant to the requirements of California Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) has completed its audit of Liberty's 2024 Vegetation Management activities included in the 2023-2025 Wildfire Mitigation Plan (WMP).

As described in the attached audit report, Energy Safety concluded that Liberty completed all vegetation management work in accordance with the WMP for the 2024 performance year.

Pursuant to statutory requirements, a copy of this report is issued to Liberty, published on Energy Safety's 2024 VM Audits Docket, and provided to the California Public Utilities Commission (CPUC).

Sincerely,

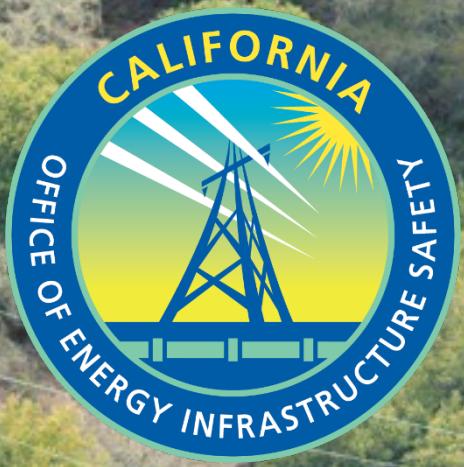
A handwritten signature in black ink that reads "Sheryl Bilbrey".

Sheryl Bilbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety

Cc:

Eric Wu, CPUC
Karen McLaughlin, Energy Safety
Stephanie Bekampis, Energy Safety
Jordan Parillo, Liberty
Eric Oiler, Liberty
Peter Stoltman, Liberty

Attachment: Liberty Utilities 2024 VMA Report



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2024 VEGETATION MANAGEMENT
AUDIT REPORT
LIBERTY UTILITIES

February 2026

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MANAGEMENT AUDIT RESPONSE

EXECUTIVE SUMMARY

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period.

The Liberty 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. Energy Safety provided its Vegetation Management Audit (VMA) of Liberty Utilities' (Liberty's) 2024 work related to its vegetation management commitments in its Wildfire Mitigation Plan (WMP) on August 28, 2025 (included in Appendix 1).¹ The VMA identified that Liberty did not provide sufficient documentation that all work was complete for two of the 13 vegetation management initiatives (Initiative 8.2.5. Quality Assurance and Quality Control and Initiative 8.2.6 Open Work Orders). Liberty provided its Corrective Action Plan (CAP) on October 16, 2025 (included in Appendix 2).² The CAP included additional data, clarifications, and corrective actions to address the two deficient vegetation management initiatives. Therefore, as discussed in this VMA Report, Liberty either provided sufficient documentation to demonstrate that all work commitments identified in the 13 vegetation management initiatives from its 2023-2025 WMP were implemented successfully in 2024 or provided a corrective action plan that Energy Safety concluded will address any remaining deficiencies.

¹ Office of Energy Infrastructure Safety, 2024 VMA of Liberty Utilities (August 28, 2025), ([Appendix 1](#)).

² Liberty Utilities, 2024 VMA Corrective Action Plan (October 16, 2025), ([Appendix 2](#)).

1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period. The VMA includes three phases:

1. **The audit.** The VMA identifies deficiencies in the electrical corporation's implementation of the vegetation management commitments in its WMP.³ Energy Safety provided the 2024 VMA to Liberty on August 28, 2025, via electronic mail.⁴ The VMA is included in Appendix 1.
2. **The CAP.** Energy Safety then provides the electrical corporation time to respond to and develop corrective actions for any deficiency specified in the VMA and to provide this response in its CAP. The electrical corporation may provide supplemental data, additional supporting documentation, clarifying statements, and corrective actions for consideration by Energy Safety for use in its final determination of the electrical corporation's performance relative to its WMP vegetation management commitments. Liberty provided its CAP to Energy Safety on October 16, 2025.⁵ Liberty's CAP is included in Appendix 2.
3. **The audit report.** Energy Safety then reviews the CAP and issues a VMA report to the electrical corporation identifying any outstanding deficiency in the electrical corporation's implementation of its vegetation management commitments in the WMP. The VMA report is publicly available on Energy Safety's E-Filing System on the 2024 VM Audits Docket. The VMA and CAP (items 1 and 2 above) are included as appendices within the VMA report. This VMA report document concludes the VMA process for the 2024 performance year.

The VMA report document is organized as follows:

- Section 2 includes a summary of the deficiencies identified during the VMA, Liberty's CAP, and Energy Safety's determination of outstanding deficiencies in Liberty's implementation of or planned corrective actions for the 2024 WMP vegetation management commitments.

³ Pub. Util. Code, § 8386.3(b)(5)(A).

⁴ Office of Energy Infrastructure Safety, 2024 VMA of Liberty Utilities (August 28, 2025), ([Appendix 1](#)).

⁵ Liberty Utilities, 2024 VMA CAP (October 16, 2025), ([Appendix 2](#)).

- Section 3 includes a discussion of Liberty’s vegetation management program maturity and programmatic performance relative to the achievement of the objectives of WMP in 2024.
- Section 4 is Energy Safety’s conclusion regarding Liberty’s completion of all work associated with its WMP commitments and program performance for 2024.

2. LIBERTY’S 2024 VMA FINDINGS

Liberty’s 2023-2025 WMP identifies the objectives, preventative strategies, and programs that Liberty has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. Energy Safety analyzed each of the thirteen vegetation management initiatives listed in Section 8.2 (Vegetation Management and Inspections) of Liberty’s 2023-2025 WMP⁶ as part of the VMA. Each initiative includes one or more commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements within each initiative and determined whether Liberty had completed all work associated with each commitment in performance year 2024. Energy Safety’s determination of whether all work was complete was based on data and documentation submitted by Liberty.

Energy Safety determined that an initiative was “complete” if Liberty provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, Energy Safety determined that the initiative was “deficient.”

Energy Safety’s VMA found that Liberty provided data and documentation to support completion of work for 11 of the 13 initiatives and did not provide information and documentation to support completion of work for two initiatives. Of the two initiatives identified in the VMA, Liberty’s CAP either provided additional documentation to demonstrate that it completed the work or had begun to implement corrective actions to address the two deficient initiatives. As a result, Energy Safety concluded that Liberty successfully achieved the objectives of all 13 of its vegetation management initiatives in its 2023-2025 WMP for performance year 2024.

⁶ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 230 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

2.1 WMP VM commitment assessment approach

The purpose of the VMA is to determine whether Liberty performed all work related to commitments made in its WMP and identify any deficiencies in Liberty's vegetation management programs that have the potential to increase wildfire ignition risk.

The VMA includes the following steps:

1. **Completion of Work**- Determination of whether the electrical corporation submitted sufficient documentation to demonstrate that it performed all work for each of the vegetation management commitments described in the WMP.

If the electrical corporation provided sufficient documentation demonstrating that all work was completed for all commitments within an initiative, Energy Safety concluded that the initiative is complete, and the analysis ended here. If the electrical corporation did not provide sufficient documentation to conclude that all work was complete, then Energy Safety continued the analysis to include one or more of the following:

2. **Assessment of Constraints**- Energy Safety reviewed the documentation provided regarding constraints to determine acceptability and commitment to resolving constraints in a timely way.
3. **Corrective Actions**- Energy Safety reviewed the corrective actions proposed by the electrical corporation to determine if the proposed corrections will prevent future deficiencies and ensure that WMP commitments will be completed in future performance years.
4. **Achievement of Objective**- Determination of whether the electrical corporation's incomplete work has detracted from its ability to achieve the objective of the initiative after considering constraints and planned corrective actions.

2.2 Analysis of work commitments associated with 2024 VM Initiatives

Liberty's 2024 VMA findings identified two initiatives for which it initially did not provide sufficient documentation to support that all work was completed. Liberty was able to provide additional documentation and corrective actions in its CAP response to support completion of the two initiatives that Energy Safety initially found to be deficient in the VMA.

A summary of Energy Safety's VMA findings regarding the VM initiatives and VMA report determinations are presented in Table 1. Energy Safety's analysis which resulted in these conclusions is described for each initiative below.

Table 1. Summary of Energy Safety's findings regarding completion of Liberty's VM Initiatives in its 2023-2025 WMP for performance year 2024. Deficient initiatives are bold.

Vegetation Management Initiative	VMA Finding	VMA Report Finding
8.2.2. Vegetation Management Inspections	Complete	Complete
8.2.3.1 Pole Clearing	Complete	Complete
8.2.3.2 Wood and Slash Management	Complete	Complete
8.2.3.3 Clearance	Complete	Complete
8.2.3.4 Fall-In Mitigation	Complete	Complete
8.2.3.5 Substation Defensible Space	Complete	Complete
8.2.3.6 High-Risk Species	Complete	Complete
8.2.3.7 Fire Resilient Right-of-Ways	Complete	Complete
8.2.3.8 Emergency Response of Vegetation Management	Complete	Complete
8.2.4 Vegetation Management Enterprise System	Complete	Complete
8.2.5. Quality Assurance and Quality Control	Deficient	Complete
8.2.6 Open Work Orders	Deficient	Complete
8.2.7 Workforce Planning	Complete	Complete

VMA Finding 1—8.2.5 Quality Assurance and Quality Control

The purpose of this initiative was to “establish an audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”⁷

Summary of Initiative Work Commitments and Identified Deficiencies

Energy Safety assessed three work commitments under Liberty’s 8.2.5 Quality Assurance and Quality Control Initiative. The information provided by Liberty indicated that all work was completed for two of those three commitments. The third commitment, “QC Assessment Goals and Target Pass Rates,” was deficient.

In its 2023-2025 WMP, Liberty organized its QA/QC program into four components: (1) completed tree work, (2) detailed inspections, (3) hazard tree work, and (4) pole clearing. Each component addressed a different focus area of Liberty’s vegetation management program and included assessments of activities specific to that focus area. In its 2023–2025 WMP, Liberty committed to meeting annual sample size and pass rate goals for the activities within each component.

Liberty provided documentation indicating that it met all sample size goals across the four components in 2024 but did not meet all of the pass rate goals. For a detailed summary of Liberty’s 2024 QA/QC assessment results, please refer to Section 8.2.5, Quality Assurance and Quality Control, in Appendix 1 of this document.⁸

Additionally, during its initial review of Liberty’s QC inspection records, Energy Safety noted that some records had not been reviewed or were still pending review at the time Liberty submitted its records. Energy Safety required Liberty, in its CAP response, to explain why these QC inspection records had not been reviewed or were still pending review.

Liberty’s CAP Response

In its CAP response, Liberty stated that it exceeded its overall quantitative QA/QC target, met the sample size requirements for each activity in all four components of its QA/QC program, and used findings from QC inspections to complete work in accordance with applicable

⁷ [Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 6, 2022, p. A-25 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁸ Office of Energy Infrastructure Safety, 2024 VMA, (August 28, 2025), ([Appendix 1](#)), pp. A30 to A-33.

specifications and standards. Liberty also stated that insights gained from QC assessments have been incorporated to support continuous improvement in its VM program.⁹

Additionally, Liberty stated that:

While some condition-specific pass rates within individual QC components fell below the goals specified in Table 8-30 of the 2023-2025 WMP, these deviations did not impact the program's overall effectiveness. Liberty places great emphasis on the overall score for each QC program component when evaluating program effectiveness. In DR No. 22 and 24 from OEIS-E-SVM_2025-Liberty-001, Liberty provided examples of contractor evaluations and supporting correspondence which demonstrate its efforts to improve performance at a systematic level informed by the pass rate methodology.

Additionally, Liberty recognizes the value of analyzing condition-level pass rates to identify opportunities for improvement within each component. As such, QC findings are reviewed, and rework is assigned where applicable. Liberty's post-work verification process also operates as intended to complete work to standards and specifications. To maintain quality of work, the pass rates are based on work quality goals and not a measure of work completion.

In its 2026–2028 WMP, Liberty updated the pass rate targets for each program component in Table 9-21. Liberty will continue to evaluate specific conditions under each component, as shown in Tables 9-25 through 9-28. The overall pass rate score for each component will remain unchanged and is an average of all evaluated conditions and measured against pass rate targets in Table 9-21.¹⁰

Regarding QA/QC records that were not reviewed, Liberty stated that:

Once VM work is completed, records are migrated into the QC work management software for sampling and inspection, if necessary. The objective of QC inspections is to provide reasonable assurance that high quality work is being performed and meeting program requirements. As such, Liberty's QC process is based on judgmental sampling, not full inspection.

Records that did not undergo QC inspection are excluded from reportable targets, pass rates, and other program performance metrics. Such excluded records include: duplicated QC records, access limitations, or other situational factors.¹¹

⁹ Liberty utilities, 2024 VMA CAP (October 16, 2025), ([Appendix 2](#)), pp. 2-3.

¹⁰ Liberty utilities, VMA CAP (October 16, 2025), ([Appendix 2](#)), p. 3.

¹¹ Liberty utilities, VMA CAP (October 16, 2025), ([Appendix 2](#)), p. 4.

Analysis of Liberty's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Meeting QA/QC pass rate goals provides assurance that vegetation management activities are being implemented as intended and that work practices are effectively mitigating ignition risk across Liberty's system. Because Liberty did not achieve all of the pass rate goals included in its 2023–2025 WMP, Liberty did not fully complete the work associated with its QC sample size and pass rate goal commitment. Accordingly, Energy Safety initially found this commitment and Initiative 8.2.5, Quality Assurance and Quality Control, to be deficient.

While some pass rate goals were not met, Liberty's 2024 QA/QC program was comprehensive and Liberty used its QA/QC data to improve performance.¹² Information provided during Energy Safety's initial audit and reiterated in Liberty's CAP support that Liberty verified contractor work, monitored QA/QC results, and took corrective actions in response to QC inspection findings in 2024.¹³

During the 2024 VMA, Liberty submitted email correspondence indicating that, in April 2025, it notified its contractor of QC results for the hazard-tree and completed-tree work components of its QA/QC program and outlined corrective actions planned for 2025. These actions included conducting regular meetings with the contractor in the field to review QC findings, monitoring work progress to avoid over-assigning work, and increasing tree crew visits and field observations by System Arborists to support meeting 2025 pass rate goals.¹⁴

This documentation demonstrates that although some 2024 pass rate goals were not achieved, Liberty's QA/QC activities supported the overall objective of Initiative 8.2.5, “to establish an audit process to manage and confirm work completed by employees and contractors and to package QA/QC information for use in decision-making and integrated workforce-management processes.”¹⁵ Further, Liberty has demonstrated that it has communicated corrective actions to its contractor to improve performance in 2025.

Lastly, regarding 2024 QA/QC records that were not reviewed by Liberty, Energy Safety independently verified that Liberty did not count those incomplete inspections toward the targets, pass rates, and other performance metrics that Liberty reported. Because sample size

¹² Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true), Published July 26, 2024, pp. 246-247 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

¹³ Office of Energy Infrastructure Safety, 2024 VMA of Liberty Utilities. (August 28, 2025), ([Appendix 1](#)), pp. A-34 to A-35.

¹⁴ Data Request OEIS-E-SVM_2025-Liberty-001, Question 24; attachment: “2024 QC Results – WTS.pdf.”

¹⁵ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

goals were met without relying on these records, Energy Safety concluded that the incomplete records did not affect the initiative's quantitative goals or implementation.

Initiative Level Determination

Liberty provided sufficient documentation during Energy Safety's 2024 VMA to demonstrate completion of its 2024 QA/QC commitments and demonstrated that it communicated QA/QC results to its vendor and implemented corrective actions to address identified deficiencies. Energy Safety concluded that these activities demonstrate that Liberty implemented a successful QA/QC program in 2024 which supported the objective of Initiative 8.2.5, Quality Assurance and Quality Control. While the pass rates were not achieved for 2024, Liberty has planned corrective actions which will improve performance in future years.

Given the information in the CAP response, Energy Safety determined that Liberty's performance for Initiative 8.2.5, Quality Assurance and Quality Control, is not deficient. Energy Safety will continue to monitor pass rates in future performance years to ensure that corrective actions are adopted by its contractors.

VMA Finding 2—8.2.6 Open Work Orders

The purpose of this initiative was to manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities.¹⁶

Summary of Initiative Work Commitments and Identified Deficiencies

Energy Safety assessed whether Liberty completed open work orders within the time frames designated for each based on the work order's priority as described in its WMP. The information provided by Liberty did not substantiate that all work was within these time frames, and therefore, Energy Safety found the initiative to be deficient.

Liberty committed to assigning risk-based priority levels and mitigation timeframes to trees identified for mitigation as outlined in its VM-05, Vegetation Threat Procedure:

- “Priority 1 Conditions: Any observed tree, or parts thereof, that is failing or expected to imminently fail and contact electric facilities or any observed tree, or parts thereof, where it appears that contact has occurred with electric facilities.
 - P1 Mitigation: Clear the threat within 24 hours.

¹⁶ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

- Priority 2 Conditions: Any observed tree, or parts thereof, that is not a Priority 1 condition but is likely to fail and impact electric facilities prior to issuing a planned maintenance work order (failure may be expected within 6 months).
 - P2 Mitigation: Clear the threat within 30 days.
- Priority 3 Conditions: Any observed tree, or parts thereof, that is not a Priority 1 or Priority 2 condition but there is a probability of failure and contact with electric facilities within 2 years.
 - P3 Mitigation: Add to the tree inventory for creating and scheduling a planned maintenance work order. The threat shall be re-assessed or mitigated within 9 months.
- Priority 4 Conditions: Any observed tree, or parts thereof, that is not considered a Priority 1, Priority 2, or Priority 3 condition, is currently stable, may be in decline or defective, but is not expected to fail and contact electric facilities.”¹⁷

Energy Safety’s 2024 VMA found that Liberty had not recorded work completion dates for all vegetation management work orders in its system of record. Consequently, the information Liberty provided during the 2024 VMA indicated that 50 out of 5,653 work orders (<1%) created in 2024 had not been completed because no work completion dates were recorded for those work orders. Out of the 50 work orders that did not have recorded work dates, two were classified as Priority 1, three were classified as Priority 2, and 45 were classified as Priority 3.¹⁸

Liberty’s CAP Response

In its CAP response, Liberty stated that it disagrees with Energy Safety’s finding for the Open Work Orders Initiative and provided information regarding the 50 work orders without recorded work dates.¹⁹ The documentation provided with Liberty’s CAP indicates that:

- 45 work orders are marked with the status “No Work”, indicating no tree work was required.
- 5 work orders are marked as “Completed” but lack a recorded work date.

Regarding the five work orders with a completed status, but lacking an associated work date, Liberty stated that its “vegetation management crews typically record time entries in the work management software, which automatically logs the completion date. However, if a work order is manually updated to ‘Completed’ without a time entry, the system does not capture a work date.”²⁰

¹⁷ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true), Published July 26, 2024, pp. 248-251 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true>).

¹⁸ Office of Energy Infrastructure Safety, 2024 VMA of Liberty Utilities. (August 28, 2025), ([Appendix 1](#)), pp. A-38.

¹⁹ Liberty Utilities, 2024 VMA CAP (October 16, 2025), ([Appendix 2](#)), pp. 5-6.

²⁰ Liberty Utilities, 2024 VMA CAP (October 16, 2025), ([Appendix 2](#)), p. 5.

Liberty stated that it reviewed the five “completed” work orders with missing work dates by conducting post-work verification inspections and reported:

1. Work completed April 10, 2023, under a separate work order; the 2024 work order was deleted post-sync but retained internally.
2. Manually updated to “completed” on October 2, 2024.
3. Duplicate of another work order that was completed May 10, 2024.
4. Work order comments indicate tree removal was performed by a third party.²¹
5. Manually updated to “completed” on September 24, 2024.²²

As a corrective action, Liberty stated that it is “actively exploring system controls to prevent future instances where a work order is marked “Completed” without a corresponding work date.”²³

Analysis of Liberty’s Performance with the Vegetation Management 2023-2025 WMP Initiatives

In its 2024 VMA, Energy Safety required Liberty to provide either work dates for the 50 P1, P2, and P3 trees that did not have a record of completion, or documentation explaining why the work was either constrained or not required as part of Liberty’s CAP.²⁴ In response, Liberty included an Excel file in its CAP which contained records of the 50 vegetation work orders that did not have records of completion. The Excel file contained the information Liberty previously provided in response to data request OEIS-E-SVM_2025-Liberty-001, as well as additional details, including a “work status” field.²⁵ Upon review of the provided Excel file, Energy Safety confirmed that the “work status” field indicated that 45 of the 50 work orders without recorded work dates had a status of “no work required,” indicating that Liberty ultimately determined that the work orders were unnecessary and therefore no work date was recorded.

The remaining five work orders had a status of “complete” in the work status field but lacked recorded completion dates. For these five work orders, Liberty provided “post-work verification inspection” reports as part of its CAP response. The reports documented field visits conducted in 2025 to confirm completion of the five work orders. Each report included photographs of the work order locations, showing either stumps from removed vegetation or

²¹ Liberty informed Energy Safety via email that this work order was manually updated to completed on September 2, 2024 once it was determined the tree was removed by a private party.

²² Liberty Utilities, 2024 VMA CAP (October 16, 2025), ([Appendix 2](#)), p. 5.

²³ Liberty Utilities, 2024 VMA CAP (October 16, 2025), ([Appendix 2](#)), p. 5.

²⁴ Office of Energy Infrastructure Safety, 2024 VMA of Liberty Utilities. (August 28, 2025), ([Appendix 1](#)) p. A-38.

²⁵ Liberty Utilities, 2024 VMA CAP (October 16, 2025), attachment “20204 Open Work Orders without work date.xlsx.”

site overviews indicating that no hazard trees or vegetation encroachments to Liberty's electrical facilities were present.

The reports also indicated that all five work orders had been manually updated to complete without entering a completion date. Based on the manual update dates provided in Liberty's CAP response, and follow up email, all five of the work orders were manually updated to complete within Liberty's designated timeframes.

This additional information provided in Liberty's CAP response sufficiently responded to the requests made by Energy Safety in its 2024 VMA by demonstrating that all of Liberty's vegetation management work orders from 2024 were either completed within Liberty's risk-based mitigation timeframes or were later determined to not require the work prescribed.

Initiative Level Determination

The additional information provided in Liberty's CAP response demonstrated that all vegetation management work orders created in 2024 were either completed within Liberty's risk-based mitigation timeframes or determined to be unnecessary. Energy Safety concluded that Liberty met the objective of Initiative 8.2.6, Open Work Orders and took appropriate actions to manage its open work orders by mitigating vegetation hazards as prescribed during inspections.

Given the information in the CAP response, Energy Safety revised its initial finding and determined that Liberty's performance for Initiative 8.2.6, Open Work Orders is not deficient. Energy Safety expects Liberty to implement the system controls it committed to in its CAP response to prevent future instances in which a work order is assigned a status of complete without a corresponding completion date. Such controls will help ensure timely completion of required work and reduce unnecessary resource use to revisit sites solely to confirm that work has already been completed or was not necessary. Energy Safety also expects Liberty to track work orders that are revised during reinspection. For example, Liberty should record the date when a work order that was initially assigned pruning or removal was determined to no longer require this work. This will allow Liberty to verify that all work orders are responded to within its required timeframes, including those ultimately deemed unnecessary.

3. LIBERTY'S 2024 VM PROGRAMMATIC PERFORMANCE ASSESSMENT

3.1 Performance assessment of Liberty's VM program

The programmatic assessment is an evaluation of Liberty's VM program maturity. Energy Safety considers Liberty's year-over-year progress in achieving VM objectives, and whether Liberty has implemented the corrective actions as described in CAP responses from previous performance periods. Energy Safety also evaluates the totality of the vegetation management work and initiative level analysis conclusions to determine whether Liberty completed sufficient work in all initiatives within its vegetation management program to meet the stated objectives of the WMP and minimize the risk of catastrophic wildfire posed by electrical lines and equipment.

3.2 2024 VM programmatic level performance analysis

Energy Safety's VMA, dated August 28, 2025, found that Liberty completed all work in 11 of the 13 initiatives in its 2023-2025 WMP and was deficient in two. Liberty's CAP, dated October 16, 2025, supplied additional clarifying information regarding the two deficient initiatives that addressed the deficiencies identified in the VMA and supplied corrective actions to improve performance in future years.

As discussed above, Energy Safety found that several of Liberty's QA/QC pass rate goals were not achieved in 2024. Energy Safety's audit of Liberty's 2023 vegetation management work also identified unachieved pass rate goals in 2023.²⁶ Notably, several pole clearing activities fell below their pass rate goals in both years, and pass rates for seven of the nine pole clearing activities declined by 0.23% to 5.27% from 2023 to 2024.²⁷

²⁶ [Office of Energy Infrastructure Safety, 2023 Substantial Vegetation Management Audit of Liberty Utilities](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58202&shareable=true), Published (April 2, 2025), pp. A20-A24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58202&shareable=true>).

²⁷ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22; attachment: "2024 QC Summary.xlsx."

Liberty's QA/QC program successfully detected these deficiencies and Liberty took corrective actions in 2024. However, this year-over-year failure to meet pass rate goals indicates continued need for improvement in contractor training and performance to ensure that vegetation management work is carried out accurately and effectively to reduce ignition risk on Liberty's system. Energy Safety expects Liberty to continue to work with its contractors to implement the planned corrective actions to improve performance.

Regarding Liberty's timely completion of vegetation management work orders, in 2023, Liberty met 2,490 of its 2,568 (96%) priority 1, 2, and 3 work order timeline targets within the 2023 performance year, falling short by 78 (3%) work orders.²⁸ In 2024, Liberty provided documentation which indicated that all 5,653 work orders created in 2024 were either completed within its risk based mitigation timeframes or were determined to not require work. As discussed above, Liberty needs to improve some record keeping practices related to the management of its vegetation management work orders. However, the record keeping deficiencies identified by Energy Safety during its 2024 VMA only affected a small fraction of work in 2024 (<1%). The information provided by Liberty demonstrates continued progress in Liberty's completion of vegetation management work orders within its risk-based mitigation timeframes.

Overall, Liberty demonstrated continued improvements in its vegetation management programs, completed vegetation management work in its WMP, and met the objectives of the 13 VM initiatives in its 2023-2025 WMP in performance year 2024. Further, Liberty began to implement corrective actions to improve its QC pass rates and to improve its record-keeping to improve work order tracking. Therefore, Energy Safety finds that programmatically, Liberty performed the large majority of the work described in its 2023-2025 WMP.

4. CONCLUSION

Based upon the analysis discussed in Sections 2 and 3, Energy Safety concludes that Liberty has successfully achieved the objectives of its vegetation management program, completing all work associated with its WMP commitments. While Energy Safety has identified some areas for improvement, Liberty has committed to corrective actions to address these deficiencies in future years.

²⁸ [Office of Energy Infrastructure Safety, 2023 Substantial Vegetation Management Audit of Liberty Utilities](#), Published (April 2, 2025), pp. A20-A24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58202&shareable=true>); Office of Energy Infrastructure Safety, 2024 VMA of Liberty Utilities (August 28, 2025), ([Appendix 1](#)), pp. A-30 to A-33.

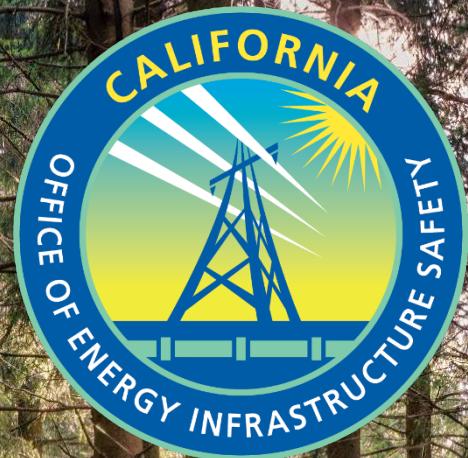
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A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 15th Floor
Sacramento, CA 95814
916.902.6000





APPENDIX 1. Liberty 2024 Vegetation Management Audit

APPENDIX DESCRIPTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), Energy Safety may annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Vegetation Management Audit (VMA) shall identify deficiencies in the electrical corporation's implementation of the vegetation management commitments in its Wildfire Mitigation Plan (WMP).

Energy Safety analyzed each of the 13 vegetation management initiatives listed in Liberty's 2023-2025 WMP for performance year 2024 as part of its VMA.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of Liberty's 2023-2025 Wildfire Mitigation Plan (WMP), Energy Safety identified the quantitative targets and commitments as well as verifiable, narrative statements relevant to each initiative and compared that to the work performed by Liberty in 2024.

This appendix reproduces the information sent to Liberty on August 28, 2025 and describes Energy Safety's analysis and determination of whether Liberty completed all work for each Vegetation Management Initiative.

Energy Safety's analysis included a summary of the information provided by Liberty to substantiate completion of each target or statement, Energy Safety's analysis of that information, and a conclusion regarding completion. Based on the determination of completeness for all targets and statements, Energy Safety provides a finding for each initiative. A finding of "Completed all work" was given only if Liberty provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement was incomplete or insufficiently documented, the overall finding for the initiative was "did not complete all work."

For any commitment or statement for which Liberty was not able to provide supporting documentation or information to support completion, Liberty was asked to address those deficiencies as a part of a corrective action plan (CAP). Liberty's CAP is included in Appendix 2.

Liberty Utilities' 2024 WMP Vegetation Management Audit

Audit Date: August 28, 2025

Revision Date: September 30, 2025

Response Due: October 16, 2025

To: Liberty Utilities
Dan Marsh
Senior Manager, Rates and Regulatory Affairs
Liberty Utilities
701 National Avenue Tahoe Vista, CA 96148

From: Sheryl Bilbrey
Sheryl.Bilbrey@energysafety.ca.gov

CC: Karen McLaughlin, Energy Safety
Forest Kaser, CPUC
Leslie Palmer, CPUC
Peter Stoltman, Liberty Utilities
Jordan Parillo, Liberty Utilities
Eric Oiler, Liberty Utilities

Subject: Office of Energy Infrastructure Safety's Audit of Liberty Utilities' 2024 WMP
Vegetation Management Commitments

Appendix 1.

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) has completed an audit of the WMP vegetation management initiative commitments in Liberty Utilities (Liberty) 2023-2025 Wildfire Mitigation Plan (WMP) for the 2024 performance year.

The audit findings provided in this document are based on Energy Safety's analysis of all relevant data provided to Energy Safety by Liberty to substantiate completion of all vegetation management work commitments in qualitative statements and quantitative targets in its WMP during performance year 2024. Instances where the data provided by Liberty did not substantiate completion of the work associated with the WMP vegetation management initiative commitments are documented as deficiencies in this audit.

Upon receipt of this audit document, Liberty must provide additional data or clarifications to Energy Safety as part of a Corrective Action Plan (CAP), described below. Energy Safety is available to meet with Liberty to discuss the audit findings and provide any clarification necessary for Liberty to prepare the CAP.

Energy Safety will consider all supplemental information and data included in the CAP as part of the analysis of Liberty's performance relative to the 2024 WMP vegetation management initiative commitments. Upon completion of Energy Safety's analysis of the CAP, Energy Safety will publish an Audit Report identifying any outstanding deficiencies in Liberty's implementation or planned corrective actions relative to its vegetation management commitments in the Liberty 2023-2025 WMP.²⁹

²⁹ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

Liberty Corrective Action Plan

The CAP is an opportunity for Liberty to provide supplemental data, additional supporting documentation and/or clarifying statements for consideration by Energy Safety's as part of our analysis of Liberty's implementation or planned corrective actions relative to its vegetation management commitments in the 2023-2025 WMP. To support Energy Safety's performance assessment, the Liberty CAP may include any of the following:

- Supplemental data and/or supporting documentation substantiating completion of all work on the vegetation management commitment identified as incomplete or deficient in this audit during the 2024 performance year;
- Detailed documentation of constraint(s) that prevented completion of the work commitment and the actions Liberty has taken to resolve those constraints; and/or
- Description of corrective actions Liberty has implemented or plans to implement to address outstanding deficiencies identified in past or current vegetation management audits.

Liberty must email a copy of its response report to Energy Safety within **30 days** of receipt of this document unless otherwise stated. The list of recipients should include:

- Karen McLaughlin, karen.mclaughlin@energysafety.ca.gov
- Environmental Science Division, environmentalscience@energysafety.ca.gov

Audit Process Overview

Energy Safety analyzed each of the thirteen vegetation management initiatives listed in Liberty's 2023-2025 WMP³⁰ as part of this initial audit report. The WMP identifies the electrical corporation's objectives, preventative strategies, and programs that it has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. The vegetation management section of the WMP includes 13 initiatives, each of which includes one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements relevant to each initiative and compared that to the work performed by Liberty in performance year 2024. Determination of whether all work was complete for each commitment was based on data and documentation submitted by Liberty.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of Liberty's 2023-2025 WMP, quantitative targets and commitments as well as verifiable, narrative statements were assessed for completion. Liberty provided information and documentation to support completion of work for 11 of the 13 initiatives, and did not provide information and documentation to support completion of work for two initiatives. A summary of Energy Safety's findings regarding the VM initiatives is presented in Table 1. A summary of all work commitments for each initiative and Energy Safety's determination on completeness is presented in Table 2.

For each WMP commitment, a summary of the supporting information provided by Liberty, Energy Safety's analysis of that information, and a conclusion regarding completion are documented. Energy Safety then provides a finding for each initiative. A finding of "complete" was given only if Liberty provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, the overall finding for the initiative was "deficient."

³⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

Appendix 1.

Table 1. Summary of Energy Safety's findings regarding completion of Liberty's VM Initiatives in its 2023-2025 WMP for compliance year 2024. Deficient initiatives are bold.

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2. Vegetation Management Inspections	8.2.2 Vegetation Management Inspections	Complete
8.2.3. Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Complete
8.2.3. Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Complete
8.2.3. Vegetation and Fuels Management	8.2.3.3 Clearance	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Complete
8.2.3. Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	See finding for Initiative 8.2.3.4 Fall-In Mitigation.
8.2.4 Vegetation Management Enterprise System	8.2.3.3 Clearance	Complete
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	Deficient
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Deficient
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Complete

Appendix 1.

Table 2. Summary of Energy Safety's findings regarding completion of Liberty's WMP commitments in performance year 2024. Incomplete commitments are bold.

WMP Commitment (Target ID)	2024 Target	2024 Actual	2024 Conclusion
Detailed Vegetation Management Inspections (VM-INSP-01)	220 circuit miles	259 circuit miles	Completed all work
Patrol Inspections (VM-INSP-02)	Conduct supplemental patrols as needed	136 circuit miles	Completed all work
LiDAR Inspections (VM-INSP-03)	700 circuit miles	700 circuit miles	Completed all work
Pole Clearing- PRC 4292 (VM-VFM-01)	4,960 subject poles	5,084 subject poles	Completed all work
Wood and Slash Management (VM-VFM-02)	280 acres	351 acres	Completed all work
Clearance Maintenance (VM-VFM-05)	Conduct Clearance work as needed	703 line miles	Completed all work
Fall-In Mitigation (VM-VFM-06)	220 circuit miles	364 circuit miles	Completed all work
Substation maintenance and treatments (VM-VFM-03)	24 treatments	23 treatments*	Completed all work
Manage High Risk Species (VM-VFM-07)	See finding for Initiative 8.2.3.4 Fall-In Mitigation.		
IVM and Right of Way maintenance projects	Enhanced maintenance projects in forest resilience corridors and development of IVM program	Achieved	Completed all work
Emergency Response planning and implementation	Emergency response vegetation management	Not applicable	Completed all work

Appendix 1.

WMP Commitment (Target ID)	2024 Target	2024 Actual	2024 Conclusion
(VM-VFM-08)			
Vegetation Management Enterprise System upgrades and implementation (VM-ESG-01)	Continue to update and develop work management software	Achieved	Completed all work
Quality Assurance and Quality Control (VM-QAQC-01)	229 circuit miles inspected	234 circuit miles inspected	Completed all work
QC Assessment Goals and Target Pass Rates	QC Sample sizes and pass rates	Sample sizes achieved, pass rates not achieved	Did not complete all work
QC review	Post-work verification and third-party QC review	Achieved	Completed all work
Timeframes for priority work completion	24 hours for priority 1 30 days for priority 2 9 months for priority 3	Did not achieve	Did not complete all work
Training and workforce development	Training and course offerings	Achieved	Completed all work

*Construction activities prevented a second treatment at the Portola substation in June 2024, preventing inspection and treatment activities.

Analysis of Initiative Completion

8.2.2 Vegetation Management Inspections

The purpose of this initiative is to describe the “[i]nspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”³¹ Inspection activities included Detailed Vegetation Inspections, Off-Cycle Patrol Inspections, and LiDAR Inspections which are analyzed in the sections below.

8.2.2.1 Detailed Vegetation Inspections

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

Liberty included the following target in its 2023-2025 WMP.³² For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	Liberty’s 2024 Target	Actual Completed in 2024
Vegetation Management Inspection Program – Detailed	220 circuit miles	259 circuit miles

Supporting Information and Analysis: In response to Data Request OEIS-E-SVM_2025-Liberty-001, Liberty provided an Excel file that summarized its ground-based detailed inspections. The file included the circuit ID, line designation, number of circuit miles inspected, and inspection start and end dates.³³ According to this file, Liberty conducted detailed inspections along 259 circuit miles in 2024. Liberty also provided a CSV file of its span level data for detailed inspections in 2024, which included the line segment ID, the utility initiative ID, the circuit IDs, the span ID, latitude, longitude, line type, circuit miles per span, inspection date, HFTD classification, and inspection status.³⁴ The number of circuit miles of detailed inspections on each line type is summarized by line type (distribution or transmission) and fire risk area (HFTD or non-HFTD) in the table below:

³¹ [Energy Safety 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(Dec. 2022\) \(hereafter Technical Guidelines\)](#), Published December 6, 2022, p. A-24

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

³² Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, pp. 209 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

³³ Data Request OEIS-E-SVM_2025-Liberty-001, Question 1; attachment: “Req 1 – WMP-VM-INS-01 Detailed Inspections – Completed projects 2024.xlsx.”

³⁴ Data Request OEIS-E-SVM_2025-Liberty-001, Question 1; attachment: “Req 1 Detailed Inspection Data.csv.”

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Line Type	HFTD	Non-HFTD	All Regions
Distribution	217	29	246
Transmission	12	0.2	13
System Wide Total	229	29	259

According to this file, Liberty conducted detailed inspections for VM-INSP-01 on 259 circuit miles, consistent with what was reported in the summary file. All of the HFTD area was in the Tier 2 risk category. The majority of its detailed inspections occurred on distribution lines in HFTD (84%).

These files are consistent with Liberty's non-spatial quarterly data report (QDR),³⁵ which indicated that Liberty conducted detailed inspections of 258-circuit miles in 2024.

Conclusion: Liberty provided information demonstrating that it exceeded its VM-INSP-01 target associated with its Detailed Vegetation Management Program.

8.2.2.2 Off-Cycle Patrol Inspections

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 1

Statement: “Supplemental ground-based inspections are performed by qualified Electric Operations personnel throughout the year. Identified conditions that may require vegetation-related work are documented and reported to VM personnel and scheduled for inspection or remediation. ... Liberty performs patrol inspections (high-risk, off-cycle, post event inspections) to locate and remove obvious hazard trees.”³⁶

Supporting Information and Analysis: Liberty's 2023-2025 WMP did not have a quantitative target for patrol inspection circuit miles. The WMP language indicated that patrol inspections would be completed on an “as needed basis” and triggered by known local conditions identified during LiDAR inspections or reported to Liberty by the public or its linemen. In response to Data Request OEIS-E-SVM_2025-Liberty-001, Liberty provided an Excel file that summarized its ground-based patrol inspections. The file included the circuit ID, line

³⁵ Liberty's Non-Spatial 2024 Quarterly Data Report, Table 1, row 32, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx.-URL: (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-QDR>).

³⁶ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 224 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

Appendix 1.

designation, number of circuit miles inspected, and inspection start and end dates.³⁷ According to this file, Liberty conducted patrol inspections along 136 circuit miles in 2024.

Liberty also provided a CSV file of its span level data for patrol inspections in 2024, which included the line segment ID, the utility initiative ID, the circuit IDs, the span ID, latitude, longitude, line type, circuit miles per span, inspection date, HFTD classification, and inspection status.³⁸ The number of circuit miles inspected during off-cycle patrol inspections completed in compliance year 2024 are summarized by line type (distribution or transmission) and fire risk area (HFTD or non-HFTD) in the table below:

Line Type	HFTD Tier 2	HFTD Tier 3	Non-HFTD	All Regions
Distribution	117	16	4	136
Transmission	0	0	0	0

According to this file, Liberty conducted patrol inspections for VM-INSP-02 on 136 circuit miles of its distribution system, consistent with what was reported in the summary file. The majority of the patrol inspections were located in HFTD Tier 2 (86%). No patrol inspections were reported for its transmission system.

These files are consistent with Liberty's non-spatial QDR,³⁹ which indicated that Liberty conducted patrol inspections along 136 circuit miles in 2024.

Liberty's response also stated that “[t]rees identified during patrol inspections requiring mitigation count towards the Fall-In Mitigation initiative,” which is assessed under 8.2.3.4 Fall-In Mitigation below.

Conclusion: Liberty provided information demonstrating it met its commitments for VM-INSP-02, Off-Cycle Patrol Inspections.

³⁷ Data Request OEIS-E-SVM_2025-Liberty-001, Question 2; attachment: “Req 1 – WMP-VM-INSP-02 Patrol Inspections – Completed Projects 2024.xlsx.”

³⁸ Data Request OEIS-E-SVM_2025-Liberty-001, Question 2; attachment: “Req 1 Patrol Inspection Data.csv.”

³⁹ Liberty's Non-Spatial 2024 Quarterly Data Report, Table 1, row 33, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx.

Appendix 1.

8.2.2.3 LiDAR Inspections

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

Liberty provided the following target in its 2023-2025 WMP.⁴⁰ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	Liberty's 2024 Target	Completed in 2024
Vegetation Management Inspection Program – LiDAR	700 circuit miles	701 circuit miles

Supporting Information and Analysis: Liberty conducted system-wide LiDAR inspections in 2024 to assess compliance with vegetation-to-conductor clearance regulations and identify vegetation concerns across its entire overhead transmission and distribution system. In response to Data Request OEIS-E-SVM_2025-Liberty-001, Liberty stated that the term system-wide refers to “Liberty’s entire overhead transmission and distribution electrical system.” Liberty provided a proposal from its contractor describing the LiDAR work to be completed in 2024,⁴¹ which described the scope of work for LiDAR imaging of Liberty’s electrical system.

Liberty provided an Excel file containing LiDAR inspection results from 2024.⁴² The file contained two worksheets: “2024 Spans” and “2024 Tree Tops.” The Spans worksheet contained LiDAR data for all spans in Liberty territory and included the acquisition date, location information (county, fire area and HFTD class, latitude and longitude), span and line IDs, section, line and span name, line miles, span length, line voltage, the Reax risk category, and a column describing the change in vegetation since the last LiDAR assessment (High, Medium, or Low). According to this file, Liberty inspected 701 circuit miles via LiDAR in 2024.

The tree tops worksheet included line and span information and more specific vegetation data recorded for each span including species information, vegetation height, vegetation quantity, presence of large wood between 4 and 6 feet. The tree tops worksheet contained 248,007 unique records of vegetation assessments associated with LiDAR inspections.

These files are consistent with Liberty’s non-spatial QDR,⁴³ which indicated that Liberty conducted LiDAR inspections along 700-line miles in 2024.

⁴⁰ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, pp. 209-210 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁴¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 5; attachment: “Liberty Proposal 2024.PDF”.

⁴² Data Request OEIS-E-SVM_2025-Liberty-001, Question 5; attachment: “LiDAR Inspections - 2024 Complete Span Data and Tree Tops.xlsx.”

⁴³ Liberty’s Non-Spatial 2024 Quarterly Data Report, Table 1, row 34, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL: (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-QDR>).

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Conclusion: Liberty provided information demonstrating it met its target for VM-INSP-03, LiDAR inspections.

Finding – 8.2.2 Vegetation Management Inspections

Liberty provided information consistent with the completion of work associated with initiative 8.2.2 Vegetation Management Inspections targets. Therefore, Energy Safety concludes initiative 8.2.2 Vegetation Management Inspections is complete.

8.2.3.1 Vegetation and Fuels Management – Pole Clearing

The purpose of this initiative is to describe the “[p]lan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”⁴⁴

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

Liberty included the following target in its 2023-2025 WMP.⁴⁵ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	Liberty’s 2024 Target	Actual Completed in 2024
Pole Clearing	4,960 subject poles	5,084 subject poles

Supporting Information and Analysis: Liberty provided an Excel file listing all poles subject to Public Resources Code section 4292 that were inspected and cleared in 2024. The file included the pole number, circuit ID, the target ID, exemption status, latitude and longitude of each pole, date the record was created, date the work was completed, work description, and comments regarding work activities.⁴⁶ The file showed that Liberty inspected 5,084 total poles and completed subsequent clearing work for 5,049 poles (99%) in 2024. Of the 35 poles which received no work, the comments indicated that all of these poles received a visual inspection, 18 of them were surrounded by cement, dirt or rocks or the area was maintained by the homeowner and thus did not require work, one pole was reported to “not exist”, two were listed as having an incorrect pole location, one was inaccessible, work was refused by homeowners for seven, and six poles did not have any comments to identify why work was not conducted. The file indicated that Liberty exceeded its target to both inspect and clear

⁴⁴ [Technical Guidelines](#), Published December 6, 2022, p. A-24 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁴⁵ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 209 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁴⁶ Data Request OEIS-E-SVM_2025-Liberty-001, Question 7; attachment: “Req 7 Pole clearing data.csv.”

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poles in its service territory and tracked constraints where work was not completed for the majority of poles.

This file is consistent with Liberty's non-spatial QDR,⁴⁷ which indicated that Liberty conducted pole clearing on 5,084 poles in 2024.

Conclusion: Liberty provided information demonstrating it met its target for VM-VFM-01, Pole Clearing.

Finding – 8.2.3.1 Pole Clearing

Liberty provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.1 Pole Clearing is complete.

8.2.3.2 Vegetation and Fuels Management – Wood and Slash Management

The purpose of this initiative is to take actions “to manage all downed wood and “slash” generated from vegetation management activities.”⁴⁸

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

Liberty included the following target in its 2023-2025 WMP.⁴⁹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	Liberty's 2024 Target	Actual Completed in 2024
Wood and Slash Management	280 acres	351 acres

Supporting Information and Analysis: In response to DR OEIS-E-SVM_2025-Liberty-001, Liberty stated that the “majority of Liberty’s Wood and Slash Management (WMP-VM-VFM-02) activities occur after hazard tree mitigation as the cleanup method for the work order. Wood and slash management is determined during ground-based inspections and coordinated during the notification process with the landowner prior to implementing the work.”

Regarding how Liberty determined its acreage target and assessed completion of that target,

⁴⁷ Liberty's Non-Spatial 2024 Quarterly Data Report, Table 1, row 35, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL: (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-QDR>).

⁴⁸ Technical Guidelines, Published December 6, 2022, p. A-24 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁴⁹ Liberty Utilities, 2023-2025 Base Wildfire Mitigation Plan, Published July 26, 2024, p. 209 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

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Liberty stated that it “calculates acres treated based off completed work orders with cleanup methods of 100% removal or cutting wood rounds into firewood lengths.”

To establish completion of this target, Liberty provided an Excel file of its fuel management activities which included the work order ID, circuit ID and section, latitude and longitude, number of trees, work date, clean-up method, ownership of the land cleaned, and number of acres cleared.⁵⁰ This file indicated that Liberty cleared 295 acres, 252 acres of which had 100% removal (86%) and 43 acres (14%) where wood was cut into firewood lengths. Liberty also provided the scopes of work and final reports for two projects describing fuel management activities at two larger project sites: Hobart Mills 7700 circuit (27 acres and 7.5 line miles)⁵¹ and Martis Peak Road (29 acres and 8 line miles).⁵² The scopes of work described the work sites and project partners, and work to be completed. The final reports included a summary of the work completed and before and after photos of the project area demonstrating that ground fuels had been successfully removed.

The Excel file and documentation for the Hobart Mills and Martis Peak Road projects demonstrate that Liberty completed wood and slash management work on 351 acres in compliance year 2024. These files are consistent with Liberty’s non-spatial QDR,⁵³ which indicated that Liberty conducted wood and slash management on 350 acres in 2024.

Conclusion: Liberty provided information demonstrating it met its target for VM-VFM-02, Wood and Slash Management.

Finding – 8.2.3.2 Wood and Slash Management

Liberty provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.2 Wood and Slash Management is complete.

⁵⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 8; attachment: “Req 8 Fuel Management data.xlsx.”

⁵¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 8; attachments: “Hobart Fuel Management Project Summary and Report.pdf,” and “Liberty – TNF – Hobart Mills Wood Removal and Stump Grinding – SOW.pdf.”

⁵² Data Request OEIS-E-SVM_2025-Liberty-001, Question 8; attachments: “Martis Peak Rd Buffer Project Summary Report.pdf,” and “Final Martis Peak Fuel Management Project SOW.docx.”

⁵³ Liberty’s Non-Spatial 2024 Quarterly Data Report, Table 1, row 36, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL: (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-QDR>).

8.2.3.3 Vegetation and Fuels Management –Clearance

The purpose of this initiative is to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming.”⁵⁴

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 2

Statement: In section 8.2.2 Vegetation Management Inspections, Liberty made the following statement regarding clearance work: “Liberty performs LiDAR inspections of vegetation to achieve clearances around electrical infrastructure on an annual basis. Liberty mitigates vegetation encroachments identified by LiDAR inspections within maintenance action thresholds (“MAT”) before the next fire season after inspections.”⁵⁵

Supporting Information and Analysis: In response to Data Request OEIS-E-SVM_2025-Liberty-001, Liberty provided information regarding its Clearance Initiative (WMP-VM-VFM-05) methodology, which it applied across Liberty’s entire overhead distribution and transmission system.⁵⁶ Liberty stated that it uses LiDAR data to determine which trees need clearance work and verify which trees have adequate clearances on all spans annually. Liberty also stated that in 2024, tree work was only performed when vegetation encroached on its Maintenance Action Threshold, and that vegetation was cleared to its Maintenance Clearance Distance, consistent with the statements in the inspections section of its 2023-2025 WMP.

Liberty provided a CSV file of its completed clearance circuits which included the circuit ID, line class, utility initiative tracking ID, the vegetation management point (VMP) ID, VMP status, the target for that line, the progress on that line, the start and end date for the work and HFTD class for the area.⁵⁷ This file indicated that Liberty completed clearance work on 703 line miles, 670 of which were distribution line miles and 33 of which were transmission line miles.

Liberty also provided a CSV file of its clearance work orders which included the work order ID, utility tracking ID, latitude and longitude of the work site, the circuit ID and section, the nearest city, HFTD classification, line type, span ID, the vegetation risk (grow-in or fall-in), the

⁵⁴ [Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 6, 2022, p. A-24 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁵⁵ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true), Published July 26, 2024, p. 219 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁵⁶ Data Request OEIS-E-SVM_2025-Liberty-001, Question 9. attachments: “2024 Completed Clearance Circuits.csv.” and “Req 9 Clearance Data.csv.”

⁵⁷ Data Request OEIS-E-SVM_2025-Liberty-001, Question 9; attachment: “2024 Completed Clearance Circuits.csv.”

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prioritization of the work, the tree ID, work type, work status, and work completion date.⁵⁸ This file indicates that Liberty identified 2,230 trees with potential clearance concerns in 2024. Of these trees, no work was required on 583, and 1,647 required clearance work of some type was completed in 2024.

These files are consistent with Liberty's non-spatial QDR,⁵⁹ which indicated that Liberty conducted clearance activities along 703-line miles in 2024.

Conclusion: Liberty provided information demonstrating it met its commitment for VM-VFM-05, Clearance.

Finding – 8.2.3.3 Clearance

Liberty provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.3 Clearance is complete.

8.2.3.4 Vegetation and Fuels Management – Fall-In Mitigation

The purpose of this initiative is to take actions "to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment."⁶⁰

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

Liberty included the following target in its 2023-2025 WMP.⁶¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	Liberty's 2024 Target	Actual Completed in 2024
Fall-In Mitigation, High-Risk Species	220 circuit miles	364 circuit miles

Supporting Information and Analysis: Liberty provided a CSV file of its completed circuits for fall-in mitigation which included the circuit ID, line class, utility initiative tracking ID, the VMP ID, VMP status, the target for that line, the progress on that line, the start and end date for the

⁵⁸ Data Request OEIS-E-SVM_2025-Liberty-001, Question 9; attachment: "Req 9 Clearance data.csv."

⁵⁹ Liberty's Non-Spatial 2024 Quarterly Data Report, Table 1, row 39, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL: (<https://efilinginternal.oeis.local/eFiling/Getfile.aspx?fileid=e7786ce2-605e-4654-bf38-3f0809b84e2e>).

⁶⁰ Technical Guidelines, Published December 6, 2022, p. A-24 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁶¹ Liberty Utilities, 2023-2025 Base Wildfire Mitigation Plan, Published July 26, 2024, p. 209 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

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work and HFTD class for the area.⁶² This file indicated that Liberty completed fall-in work on 364 line miles, 351 of which were distribution line miles and 13 of which were transmission line miles.

This file is consistent with Liberty's non-spatial QDR,⁶³ which indicated that Liberty conducted fall-in mitigation along 364-line miles in 2024.

Conclusion: Liberty provided information demonstrating it met its target for VM-VFM-06, Fall-In Mitigation.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 3

Statement: Liberty's WMP includes several statements stating that Liberty will mitigate vegetation risks following inspections:

- From Section 8.2.2: "Detailed inspections of entire circuits are performed to prescribe pruning and removal of vegetation as a safeguard against grow-ins or fall-ins and to comply with required laws and regulations." ⁶⁴
- From Section 8.2.2.2: "Liberty performs patrol inspections (high-risk, off-cycle, post event inspections) to locate and remove obvious hazard trees." ⁶⁵
- From Section 8.2.3.4: "Liberty has developed a Hazard Tree Management Plan (VM-03) for the purpose of identifying, documenting, and mitigating trees that are located within the utility strike zone and are expected to pose a risk to electric facilities based on the tree's observed structural condition and site considerations." ⁶⁶

Supporting Information and Analysis: Liberty provided a CSV file of its fall in mitigation work orders which included the work order ID, utility tracking ID, latitude and longitude of the work site, the circuit ID and section, HFTD classification, span ID, the inspection type, the vegetation risk (grow-in or fall-in), the tree code, tree health, quantity of vegetation, work type, work status, and work date.⁶⁷ The number of work orders by tree code (a unique

⁶² Data Request OEIS-E-SVM_2025-Liberty-001, Question 10; attachment: "Fall In Mitigation Completed Circuit Miles.csv."

⁶³ Liberty's Non-Spatial 2024 Quarterly Data Report, Table 1, row 40, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL: (<https://efilinginternal.oeis.local/eFiling/Getfile.aspx?fileid=e7786ce2-605e-4654-bf38-3f0809b84e2e>).

⁶⁴ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 216 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁶⁵ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 219 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁶⁶ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 230 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁶⁷ Data Request OEIS-E-SVM_2025-Liberty-001, Question 10; attachment: "2024 Fall-In Mitigation Data.xlsx."

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Identification number assigned to each work order) where work was and was not completed for each inspection type is summarized in the table below:

Inspection Type	Tree Codes where work was completed	Tree Codes where no work was required	Total Tree Codes
Detailed Inspections	339	88	427
Patrol Inspections	1,640	73	1,715
Total Inspections	1,979	161	2,142

This file indicated that Liberty inspected 2,142 tree codes for fall-in risk (with one or more vegetation units associated with each code). Of these inspections, 1,979 (92%) of tree codes received mitigation in 2024. Of the work prescribed, 82% of completed mitigations were for work identified during patrol inspections.

Conclusion: Liberty provided documentation consistent with completion of these statements.

Finding - 8.2.3.4 Fall-In Mitigation

Liberty provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.4 Fall-In Mitigation is complete.

8.2.3.5 Vegetation and Fuels Management –Substation Defensible Space

The purpose of this initiative is to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”⁶⁸

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 4

Statement: “Liberty performs routine inspections, vegetation management, and other maintenance activities for 12 substations. Control methods include manual, mechanical, and chemical methods. Work occurs at regular intervals to maintain accessibility, safety, and adherence to all appropriate governmental regulations and Liberty policies... A minimum of two site visits will occur per facility, per year. Herbicide applications and vegetation

⁶⁸ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

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management activities will occur under the direction of the PCA. Additional cycle visits may be required for sites that do not receive herbicide applications.”⁶⁹

Supporting Information and Analysis: Liberty provided an Excel file of its substation defensible space treatments, which included the initiative tracking ID, the substation name, location information, treatment type, completion date and job notes.⁷⁰ Liberty also provided the job sheets⁷¹ for both the spring and fall maintenance work, which included photographs of the jobsites, as well as herbicide application reports.⁷² According to this documentation, Liberty inspected and treated, when treatment was necessary, 11 substations with chemical, mechanical, and/or pre-emergent chemical treatments in June of 2024 and 12 substations in October 2024. This documentation is consistent with Liberty’s non-spatial quarterly data report (QDR),⁷³ which indicated that Liberty conducted substation treatments at 23 substations in compliance year 2024.

The Excel file and data response indicated that the Portola substation was under construction in June 2024 and therefore no work was completed at this substation for that maintenance cycle, but it was completed with the other substations in October 2024. Energy Safety recognizes that construction would prevent inspection and treatment activity at the substation during the June inspection cycle. Therefore, the inspection and treatment work Liberty conducted at 23 substations satisfied the commitment for inspections in compliance year 2024.

Conclusion: Liberty provided information demonstrating it met its commitment for VM-VFM-03, Substation Defensible Space.

Finding – 8.2.3.5 Substation Defensible Space

Liberty provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.5 Substation Defensible Space is complete.

⁶⁹ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true), Published July 26, 2024, p. 234 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁷⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 12; attachment: “2024 Substation Treatments.xlsx.”

⁷¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 12; attachments: “Liberty Spring 2024 Cycle 2 Job Sheets.pdf” and “Liberty Jobsheets Fall 2024.pdf.”

⁷² Data Request OEIS-E-SVM_2025-Liberty-001, Question 12; attachments: “Liberty Fall 2024 Pre-Emergent Application Data.pdf” and “Liberty Spring 2024 Chemical Use Reports.pdf.”

⁷³ Liberty’s Non-Spatial 2024 Quarterly Data Report, Table 1, row 37, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL: (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-QDR>).

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8.2.3.6 Vegetation and Fuels Management – High-Risk Species

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.”⁷⁴

Liberty’s 2023-2025 WMP states that “Liberty’s methodology of addressing high-risk species does not differ from that described in initiative 8.2.3.4, Fall-In Mitigation.”⁷⁵ Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

Finding – 8.2.3.6 High-Risk Species

See the finding for Initiative 8.2.3.4 Fall-In Mitigation.

8.2.3.7 Vegetation and Fuels Management – Fire Resilient Right-of-Ways

The purpose of this initiative is to take actions “to promote vegetation communications that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way.”⁷⁶

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 5

Statement: “Liberty continues to work with the National Forests on enhanced right of-way maintenance projects, to target encroaching and hazardous trees and to preventatively remove incompatible tree species from the right-of-way. The enhanced maintenance projects reduce future maintenance entries, protect infrastructure, increase fire-resiliency and are the initial step of the integrated vegetation management (“IVM”) program.”⁷⁷

Supporting Information and Analysis: Liberty provided a CSV file listing 387 work orders completed in 2024 to clear encroaching and hazardous trees in forest resilience corridors.⁷⁸ Each work order identified the tree code, pole ID, circuit ID and section, work order creation date, work status, ownership (USFS, Private), priority level designation, and status of tree

⁷⁴ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁷⁵ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 235 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>). ⁷⁶ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁷⁶ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁷⁷ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, pp. 235-236 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁷⁸ Data Request OEIS-E-SVM_2025-Liberty-001, Question 14; attachment: “Req 14 Fire Resilient ROW.CSV.”

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health. According to the Excel file, 386 of the 387 total work orders designated the vegetation as a priority 3 (clear within 9 months), while the one remaining work order identified the vegetation as a priority 4 (monitor). These work orders indicate that Liberty conducted right-of-way maintenance in fire resilient corridors in coordination with the National Forests in 2024.

Conclusion: Liberty provided information consistent with the completion of work identified in this statement for VM-VFM-04, Fire Resilient ROWs.

Statement 6

Statement: “The Liberty IVM program continues to be developed with the intent of promoting a stable, low growing community of compatible shrub species. Liberty VM staff and contractors are trained to identify and collect data to document native and culturally significant shrub species.”⁷⁹

Supporting Information and Analysis: Liberty provided a copy of a syllabus for two courses: “VM habitat Initiative: Bear Buffers, Wildlife Monitoring, and Regional Collaborations,”⁸⁰ “Plant Identification and Reading the Landscape for Ground Crews,”⁸¹ an Excel file with the class schedule and attendees for the Plant ID course,⁸² an Excel file documenting the names and trainings attended by Liberty staff.⁸³ The objective of the Habitat Initiative course was to “equip participants with the knowledge and skills needed to seamlessly integrate habitat initiatives into vegetation management, focusing on black bears in the Tahoe basin, to foster a harmonious coexistence between wildlife and the utility infrastructure.” The objective of the Plant ID course was to “equip participants with a comprehensive understanding of plant identification within Sierra Nevada landscapes, focusing on common plant community types, plant families, and indicator species.” This documentation supports Liberty’s commitment to train staff and contractors in vegetation and wildlife management.

Conclusion: Liberty provided information consistent with the completion of work identified in this statement for VM-VFM-04, Fire Resilient ROWs.

⁷⁹ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, pp. 235-236 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁸⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 15; attachment: “2024.01.22 LUCA VM Habitat Initiative Syllabus.pdf.”

⁸¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 15; attachment: “2024.01.22 LUCA Plant Identification and Reading the landscape for Ground Crews.pdf.”

⁸² Data Request OEIS-E-SVM_2025-Liberty-001, Question 15; attachments: “2024.2.1 LUCA Plat ID and Reading the Landscape Class Schedule.xlsx.”

⁸³ Data Request OEIS-E-SVM_2025-Liberty-001, Question 15; attachment: “2024 Training Tracking.xlsx.”

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Finding – 8.2.3.7 Fire Resilient Right-of-Ways

Liberty provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.7 Fire Resilient Right-of-Ways is complete.

8.2.3.8 Vegetation and Fuels Management –Emergency Response of Vegetation Management

The purpose of this initiative is the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”⁸⁴

Liberty stated that it did not conduct any Emergency Response Vegetation Management (VM-VFM-08) in advance of fire weather and no fire restoration activities occurred in 2024⁸⁵ and none were reported in Liberty’s Quarterly Data Reports.⁸⁶ Therefore, no actions on any work commitments under this initiative were required or implemented and Energy Safety did not assess activities related to this initiative.

Finding – 8.2.3.8 Emergency Response of Vegetation Management

Liberty provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.8 Emergency Response of Vegetation Management is complete.

8.2.4 Vegetation Management Enterprise System

The purpose of this initiative is the “[o]peration of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.”⁸⁷

⁸⁴ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁸⁵ Data Request OEIS-E-SVM_2025-Liberty-001, Question 16; attachment: “Liberty CalPeco’s Response to DR No. OEIS-E-SVM_2025-Liberty-001.pdf.”

⁸⁶ Liberty’s Non-Spatial 2024 Quarterly Data Report, Table 1, row 42, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL: (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-QDR>).

⁸⁷ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

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Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 7

Statement: “Liberty also utilizes supplemental third-party inventory management software to analyze and review LiDAR acquisition data, inventory clearance-exempt trees, emergency response, and vegetation caused outage investigations.”⁸⁸

Supporting Information and Analysis: In response to Data Request OEIS-E-SVM_2025-Liberty-001, Liberty stated that “[i]n 2024 Liberty utilized ENVI Discover (“ENVI”), formerly referred to as InSite, by NV5 to analyze, review, and export LiDAR acquisition data. ENVI is a cloud-based geospatial data management platform that centralizes and merges geospatial data with visual point cloud representation.”⁸⁹ As noted in section 8.2.2 above, Liberty provided the NV5 proposal which included a description of this software and example outputs.⁹⁰ Liberty stated that the Excel File⁹¹ provided in response to Question 5 is a direct export of span and tree data from the ENVI software. Liberty also provided screenshots of the ENVI software to display its tools and capabilities.⁹²

Liberty also stated that it integrated LiDAR data into FieldNote, a geospatial data collection software, which it used for the majority of its vegetation management work in 2024 including VM inspections, maintenance, documentation of clearance-exempt trees, and vegetation caused outages.⁹³ Liberty provided two Excel files demonstrating the products from the FieldNote software.⁹⁴

Conclusion: Liberty provided information consistent with the completion of work identified in this statement for VM-ESG-01, Enterprise Management Software.

⁸⁸ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, pp. 238-243 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁸⁹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 17.

⁹⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 5; attachments: “Liberty Proposal 2024.pdf.”

⁹¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 5; attachment: “LiDAR Inspections - 2024 Complete Span Data and Tree Tops.xlsx.”

⁹² Data Request OEIS-E-SVM_2025-Liberty-001, Question 17; attachment” “Liberty – LiDAR Work Management Software.pdf.”

⁹³ Data Request OEIS-E-SVM_2025-Liberty-001, Question 17; attachments: “Clearance_Exempt_Tree_Inventory_2024.xlsx” and “2024_VM_Outage_Investigations.xlsx.”

⁹⁴ Data Request OEIS-E-SVM_2025-Liberty-001, Question 17; attachment: “Liberty CalPeco’s Response to DR No. OEIS-E-SVM_2025-Liberty-001.pdf.”

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Statement 8

Statement: “Liberty exports vegetation management inspection data and work orders from its software quarterly for regulatory reporting. This data is saved on Liberty’s internal server access database and Liberty’s GIS system.”⁹⁵

Supporting Information and Analysis: Liberty stated that “Vegetation inspection and maintenance data, stored in the respective databases of their field collection applications, is ingested into Liberty’s SQL server database with an API” and that responses to questions 1, 2, 5, 7, 8, 9, 10, 11, 14, and 25 in Data Request OEIS-E-SVM-2025-Liberty-001 were answered directly from Liberty’s internal database.⁹⁶ Further, Liberty’s final QDR submission was consistent with the information reported in this data request suggesting that Liberty’s reporting is consistent with its internal databases.⁹⁷

Conclusion: Liberty provided information consistent with the completion of work identified in this statement for VM-ESG-01, Enterprise Management Software.

Statement 9

Statement: “Asset and span data derived from Liberty’s annual LiDAR inspections of vegetation is integrated with Liberty’s GIS to update changes made to Liberty’s electrical system as needed. Vegetation density along circuits and other attributes found from LiDAR inspections are analyzed in combination with Reax data and HFTD regions to identify areas of the electrical system that are the highest risk.”⁹⁸

Supporting Information and Analysis: As described in Section 8.2.2.3, Liberty provided an Excel file containing LiDAR inspection results from 2024,⁹⁹ which contained the LiDAR data for all spans in its service territory as well as its tree top analysis of Reax risk category and the change in vegetation since the last LiDAR assessment. Liberty stated that it used the data in this file to prioritize work and analyze effectiveness of vegetation management strategies.¹⁰⁰

⁹⁵ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, pp. 238-243 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁹⁶ Data Request OEIS-E-SVM_2025-Liberty-001, Question 18; attachment: “Liberty CalPeco’s Response to DR No. OEIS-E-SVM_2025-Liberty-001.pdf.”

⁹⁷ Liberty’s Non-Spatial 2024 Quarterly Data Report, Table 1, rows 32-44, TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL: (<https://efilinginternal.oeis.local/eFiling/Getfile.aspx?fileid=e7786ce2-605e-4654-bf38-3f0809b84e2e>).

⁹⁸ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, pp. 238-243 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

⁹⁹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 5; attachment: “LiDAR Inspections - 2024 Complete Span Data and Tree Tops.xlsx.”

¹⁰⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 19; attachment: “Liberty CalPeco’s Response to DR No. OEIS-E-SVM_2025-Liberty-001.pdf.”

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Liberty also used LiDAR outputs to analyze vegetation grow-in zones and identify where encroachments are occurring and inventorying trees capable of striking conductors. Liberty stated that it “uses this data to identify vegetation change, risk reduction, and which regions have the highest amount of work due to number of encroachments or fall-in exposure.”¹⁰¹ Liberty provided a screen shot of its LiDAR risk reduction which displays Liberty’s analysis of vegetation encroachments from 2021 through 2024, demonstrating that Liberty is estimating risk and tracking the effectiveness of its LiDAR program.¹⁰²

Conclusion: Liberty provided information consistent with the completion of work identified in this statement for VM-ESG-01, Enterprise Management Software.

Statement 10

Statement: “Liberty integrates tree and work order inventory data with a third-party program management tracking system to oversee schedules, project status, workloads, identify project owners, and overall vegetation management annual workplan implementation and completion.”¹⁰³

Supporting Information and Analysis: Liberty stated that it imported “circuit-level data into Power BI dashboards to track progress on vegetation management initiatives, including Fall-In Mitigation, Detailed Inspections, Patrol Inspections, and Clearance” and that “[w]ork progress [was] updated daily as field data [was] collected and completed to measure against the annual plan.”¹⁰⁴ Liberty provided an Excel file of its 2024 Annual Plan which outlines planned and completed work in 2024. The plan included three worksheets (2024 maintenance plan, 2024 inspection plan, and 2024 clearance plan), and each worksheet included circuit ID, line miles, VM tracking IDs, project status, workloads, project owners, work start and end dates, and notes.¹⁰⁵ According to this plan, Liberty completed a total 3,040 project units in its Maintenance Plan, 3,740 project units in its Inspection Plan, and 1,755 project units in its Clearance Plan in compliance year 2024. The file indicates that there are no incomplete project units in 2024.

Conclusion: Liberty provided information consistent with the completion of work identified in this statement for VM-ESG-01, Enterprise Management Software.

¹⁰¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 19; attachment: “Liberty CalPeco’s Response to DR No. OEIS-E-SVM_2025-Liberty-001.pdf.”

¹⁰² Data Request OEIS-E-SVM_2025-Liberty-001, Question 19; attachment: “21-24 LiDAR_Risk_Reduction.pdf.”

¹⁰³ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true), Published July 26, 2024, pp. 238-243 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

¹⁰⁴ Data Request OEIS-E-SVM_2025-Liberty-001, Question 20; attachment: “Liberty CalPeco’s Response to DR No. OEIS-E-SVM_2025-Liberty-001.pdf.”

¹⁰⁵ Data Request OEIS-E-SVM_2025-Liberty-001, Question 20; attachment: “2024 VM Annual Plan.xlsx.”

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Finding – 8.2.4 Vegetation Management Enterprise System

Liberty provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.4 Vegetation Management Enterprise System is complete.

8.2.5 Quality Assurance and Quality Control

The purpose of this initiative is the “[e]stablishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”¹⁰⁶

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

Liberty included the following target in its 2023-2025 WMP.¹⁰⁷ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	Liberty's 2024 Target	Actual Completed in 2024
QA/QC- Completed Tree Work	229 circuit miles inspected	234 circuit miles inspected

Supporting Information and Analysis: Liberty provided an Excel file which summarized the circuits and line milage where QC inspections of tree work were completed. This file included the VM initiative tracking ID, circuit ID and section, the circuit line miles that received QC assessments, and the start and end date of the QC activities.¹⁰⁸ This file indicated that Liberty completed QC work on 234 line miles in compliance year 2024, exceeding the target of 229 circuit miles. This file is consistent with Liberty's non-spatial quarterly data report (QDR),¹⁰⁹ which indicated that Liberty conducted fall-in mitigation along 234-line miles in 2024. Liberty

¹⁰⁶ [Technical Guidelines](#), Published December 6, 2022, p. A-25 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁰⁷ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 210 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

¹⁰⁸ Data Request OEIS-E-SVM_2025-Liberty-001, Question 21; attachment: “2024 OC of Completed Tree Work Projects.xlsx.”

¹⁰⁹ Liberty's Non-Spatial 2024 Quarterly Data Report, Table 1, row 44,

TN15557_20250331T143550_Liberty_2024_Q4_Tables115_R2.xlsx. URL:

(<https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-QDR>).

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also provided an Excel file which provided a detailed description of the QA work completed for each QA/QC point describing the site location, status, and corrective work required.¹¹⁰

Conclusion: Liberty provided information consistent with the completion of this target for VM-QAQC-01, Quality Assurance and Quality Control.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Liberty 2023-2025 QA/QC narrative section of its WMP provided a comprehensive program including goals for its QA/QC statistical sampling and pass rates to ensure the quality of VM work.¹¹¹ For ease of comparison, the WMP goals for sample size and pass rates are summarized in tables for each activity below. Missed goals are in bold.

COMPLETED TREE WORK

Initiative QC Activity	Liberty's 2024 Goal	Achieved in 2024
Completed Tree Work	229 circuit miles	234 circuit miles
Completed Tree Work- MCD Achieved	98% Pass Rate	95% Pass Rate
Completed Tree Work- Work Performed	99% Pass Rate	97% Pass Rate
Completed Tree Work- 18-Month Clearance Hold	98% Pass Rate	97% Pass Rate
Completed Tree Work- Potential Hazard Remains	No goal	99% Pass Rate
Completed Tree Work- Site Clean	No goal	98% Pass Rate
Completed Tree Work- ANSI	No goal	96% Pass Rate
Completed Tree Work- Other Trees Affected	No goal	100% Pass Rate
Completed Tree Work- Site Condition	No goal	100% Pass Rate

Supporting Information and Analysis: Liberty provided an Excel file of the completed tree work projects in 2024, which listed quality checks (QCs) Liberty performed of completed tree work in 2024 and included the lead field tech, circuit, number of circuit miles that were

¹¹⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22; attachment: “2024_liberty_work_complete_qc.xlsx.”

¹¹¹ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, pp. 244-247 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

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assessed for quality control, start and completion dates, and the rework date, if applicable.¹¹² According to this file, Liberty conducted quality control assessments of completed tree work along approximately 234 circuit miles in 2024. Thus, Liberty exceeded its QA/QC target associated with completed tree work circuit miles in 2024.

Liberty also provided a summary of its quality control assessments Completed Tree Work.¹¹³ This file indicated that Liberty did not meet its target pass rates for MCD Achieved, Work Performed, nor 18-Month Clearance Hold. The Excel file also included several other QC metrics for which no goal was established in the WMP, although the file compared pass rates for 2023 to 2024 and for all metrics the pass rate improved in 2024 for completed tree work.

DETAILED PRE-INSPECTION

Initiative QC Activity	Liberty's 2024 Goal	Achieved in 2024
Detailed Pre-Inspection	77 circuit miles	78 circuit miles
Detailed Inspection- Location Description	99% Pass Rate	94% Pass Rate
Detailed Inspection- Species ID	98% Pass Rate	100% Pass Rate
Detailed Inspection- Quantity	No goal	99% Pass Rate
Detailed Inspection- Work Type	98% Pass Rate	98% Pass Rate
Detailed Inspection- Clean-up Prescription	99% Pass Rate	95% Pass Rate
Detailed Inspection- Priority	No goal	100% Pass Rate
Detailed Inspection- MCD Prescription (project type)	99% Pass Rate	100% Pass Rate
Detailed Inspection- Qty of Non-Listed Trees	No goal	90% Pass Rate

Supporting Information and Analysis: Liberty provided an Excel file of QC vegetation management inspections conducted in 2024 which included detailed and patrol inspections from a sample size representing 33% of the service area, circuit name, circuit miles/line miles, start and end dates, corrective actions required, and rework inspector and completion dates.¹¹⁴ According to this file, Liberty conducted quality control assessments of Detailed Pre-

¹¹² Data Request OEIS-E-SVM_2025-Liberty-001, Question 21; attachment: “2024 OC of Completed Tree Work Projects.xlsx.”

¹¹³ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22; attachment: “2024 QC Summary.xlsx.”

¹¹⁴ Data Request OEIS-E-SVM_2025-Liberty-001, Question 21; attachment: “2024_QC_VM_Inspections.xlsx.”

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Inspections along approximately 78 circuit miles in 2024. Thus, Liberty exceeded its QA/QC goal associated with inspection circuit miles in 2024.

Liberty also provided a summary of its quality control assessments for Detailed Inspections.¹¹⁵ This file indicated that Liberty met its goal pass rates for species identification, work type, and project type, but did not meet its goal pass rates for location description, or clean up prescription. The Excel file also included several other QC metrics for which no goal was established in the WMP, although the file compared pass rates for 2023 to 2024 and for all metrics the pass rate improved in 2024 except the quantity of non-listed trees which was within 1% of 2023.

HAZARD TREE WORK

Initiative QC Activity	Liberty's 2024 Goal	Achieved in 2024
Hazard Tree Work ¹¹⁶	524 trees	827 trees
Hazard Tree Work- Potential Hazard	99% Pass Rate	99% Pass Rate
Hazard Tree Work- Site Cleanup	97% Pass Rate	88% Pass Rate
Hazard Tree Work- ANSI Standard	99% Pass Rate	99% Pass Rate
Hazard Tree Work- Other Trees Impacted	99% Pass Rate	99% Pass Rate
Hazard Tree Work- Site Conditions Post-Work	99% Pass Rate	98% Pass Rate

Supporting Information and Analysis: Liberty provided a summary of its quality control assessments for Hazard Tree Work.¹¹⁷ This file indicated that Liberty exceeded its goal for the number of trees which would receive a QC assessment in 2024. Liberty also achieved its goals for quality control on potential hazard, work performed to ANSI standard, and other trees impacted, but did not meet its goal pass rates for site cleanup and site conditions post-work.

¹¹⁵ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22; attachment: “2024 QC Summary.xlsx.”

¹¹⁶ Liberty’s 2023 WMP states this is an “Estimate only. Hazard Tree Work can vary significantly each year depending on various field conditions.” Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 243.

¹¹⁷ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22; attachment: “2024 QC Summary.xlsx.”

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POLE CLEARING

Initiative QC Activity	Liberty's 2024 Goal	Achieved in 2024
Pole Brushing	585 poles	608 poles
Pole Brushing- Location Description	99% Pass Rate	91% Pass Rate
Pole Brushing- Non-Exempt Pole	98% Pass Rate	94% Pass Rate
Pole Brushing- Pole Tag Correct	97% Pass Rate	89% Pass Rate
Pole Brushing- 10-Foot Radial Clearance	99% Pass Rate	84% Pass Rate
Pole Brushing- No Fuel Remains in Cylinder	99% Pass Rate	88% Pass Rate
Pole Brushing- 0-8' Vertical Clearance	98% Pass Rate	86% Pass Rate
Pole Brushing- Above 8' Clearance	99% Pass Rate	99% Pass Rate
Pole Brushing- ANSI Standard	99% Pass Rate	100% Pass Rate
Pole Brushing- Site Clean-up	97% Pass Rate	99% Pass Rate

Supporting Information and Analysis: Liberty provided a summary of its quality control assessments for completed pole clearing work in 2024.¹¹⁸ This file indicated that Liberty exceeded its goal for the number of poles receiving a QC assessment in 2024. Liberty also achieved its goals for pole brushing above 8' clearance, ANSI Standard, and site cleanup, but did not meet its goal pass rates for location description, non-exempt poles, correct pole tag, 10-ft radial clearance, no fuel remaining around the cylinder, and 0-8' vertical clearance. Moreover, many of the pass rates for pole clearing were lower than those reported for 2023.

Conclusion: Liberty provided information consistent with the completion of work identified for the target for tree work completion and goals for total assessments for the four components of its QA/QC program, but did not provide information consistent with achievement of quality control pass rates for all activities.

¹¹⁸ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22; attachment: "2024 QC Summary.xlsx."

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Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 11

Statement: “Liberty conducts post work verification and reviews third-party QC inspection results as part of its Post Work Verification Procedure, VM-04. QC inspections are performed by the qualified vendor using a third-party data collection software (see Section 8.2.4: Vegetation Management Enterprise System). Errors identified during QA/QC review are communicated to the contractor as needed. Inadequate work is remediated and objective evidence to support remediation is provided to Liberty VM personnel.”¹¹⁹

Supporting Information and Analysis: Liberty provided an Excel file of all of its records for QA/QC programs: Completed Tree Work, VM Inspections, Hazard Tree, and Pole Clearing.¹²⁰ This file included all work orders for QA/ QC, QC status (which identified QC records that passed evaluations, had findings, or were assigned as corrective actions), the location information, original work status, original work date and date of QC assessment, number of tree/vegetation units assessed at each location, vegetation information (species, size, etc.), and records recording pass or no pass for each of the QC activities described in the tables above. A summary of the QC results by program is summarized in the table below:

QC Status	Completed tree work	VM Inspections	Hazard Tree	Pole Clearing
Complete with Findings	126 tree units	109 units	20 tree units	133 poles
Complete with No Findings	1082 tree units	583 units	696 tree units	378 poles
Corrective Action Completed	63 tree units	0	111 tree units	97 poles
Total QA assessments	1271 tree units	692 units	827 tree units	608 poles
Not reviewed	275 tree units	16 units	181 tree units	8 poles
Pending	3 tree units	3 units	0	1 pole

The file indicates that 1,271 total tree units in the completed tree work QC component, 692 vegetation units in the VM Inspections component, 827 tree units in the Hazard Tree

¹¹⁹ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](#), Published July 26, 2024, p. 245 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true>).

¹²⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22; attachment: “2024_VM_QC_All_Data.xlsx.”

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component, and 608 records in the Pole Clearing component were assigned for QA assessments and were shown to be complete with or without findings or had received prescribed corrective actions. The remaining records in the file were either not reviewed or were pending review at the time the file was sent to Energy Safety. This file supports that Liberty's QC inspectors measured work performed against work specifications for post work verification.

Liberty also provided examples of correspondence with its contractors, discussing errors or findings, identified during Liberty's QA/QC review of inspections, poles cleared, hazard trees, and poles brushed.¹²¹ Liberty also provided an example of a rework QC Report.¹²² These documents support that Liberty communicated deficiencies to its vendors and required corrective actions.

In addition to the files described above. Liberty also provided a document which compared QA/QC pass rates for its two vendors. This document indicated that most of the deficiencies in the pass rates were attributed to one of the vendors.¹²³ Regarding this document, Liberty stated that it "collaborated with vegetation management vendors to address deficiencies, assigned rework where needed, and shared performance data during contractor evaluations" and that its "post-work verification process operate[d] as intended to complete work to Liberty standards and specifications."¹²⁴ This comparison, together with the correspondences with those vendors, indicated that Liberty monitored the results of its QA/QC program and took action to correct deficiencies as they were identified.

Conclusion: Liberty provided documentation to support that it conducted QC reviews of the four components of its QA/QC program and communicated deficiencies with its vendors.

Finding – 8.2.5 Quality Assurance and Quality Control

Liberty did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.5 Quality Assurance and Quality Control is deficient.

In its CAP response Liberty must provide the corrective actions it will implement to ensure that QA/QC goals are achieved in 2025 as well as justification for why all QA/QC records were either not reviewed or pending review in compliance year 2024.

¹²¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 24; attachments: "Wright Tree Service – Liberty CalPeco – Work Status Update Nov 18 2024.pdf," "2024 QC Results – WTS.pdf," and "QC Pole Clearing Audit – OUTS.pdf."

¹²² Data Request OEIS-E-SVM_2025-Liberty-001, Question 24; attachment: "QC Rework Complete Report Sample.pdf."

¹²³ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22; attachment: "2024VM QC Report- Tree Vendor Comparison.pdf."

¹²⁴ Data Request OEIS-E-SVM_2025-Liberty-001, Question 22.

8.2.6 Open Work Orders

The purpose of this initiative is to take actions “to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”¹²⁵

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 12

Statement: “Trees that have been identified are mitigated based on risk. VM-05, Vegetation Threat Procedure, describes the criteria for work priority determination:

- Priority 1 Conditions: Any observed tree, or parts thereof, that is failing or expected to imminently fail and contact electric facilities or any observed tree, or parts thereof, where it appears that contact has occurred with electric facilities.
 - P1 Mitigation: Clear the threat within 24 hours.
- Priority 2 Conditions: Any observed tree, or parts thereof, that is not a Priority 1 condition but is likely to fail and impact electric facilities prior to issuing a planned maintenance work order (failure may be expected within 6 months).
 - P2 Mitigation: Clear the threat within 30 days.
- Priority 3 Conditions: Any observed tree, or parts thereof, that is not a Priority 1 or Priority 2 condition but there is a probability of failure and contact with electric facilities within 2 years.
 - P3 Mitigation: Add to the tree inventory for creating and scheduling a planned maintenance work order. The threat shall be re-assessed or mitigated within 9 months.
- Priority 4 Conditions: Any observed tree, or parts thereof, that is not considered a Priority 1, Priority 2, or Priority 3 condition, is currently stable, may be in decline or defective, but is not expected to fail and contact electric facilities.”¹²⁶

Supporting Information and Analysis: Liberty provided a CSV file of all work orders for compliance year 2024.¹²⁷ The file included initiative tracking ID, the circuit ID and section number, the priority level of the vegetation issue identified, the type of inspection in which the issue was identified, the inspection date, the work date and type, location information, and vegetation threat (Fall-In, Grow-In, or Snow Load). The file included 5,653 work orders, most of which were completed in 2024, except 46 which were completed in January 2025 for P3 trees identified during inspections in the second half of compliance year 2024. The number

¹²⁵ [Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 6, 2022, p. A-25 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹²⁶ Liberty Utilities, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true), Published July 26, 2024, pp. 248-251 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true>).

¹²⁷ Data Request OEIS-E-SVM_2025-Liberty-001, Question 25; attachment: “Req 25 Open Work Orders.CSV.”

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of trees completed within the specified time frames for each priority type are summarized below:

Priority Type	Total Work Orders	Within Time Frame	Exceeded Time Frame
1 (Clear Within 24 Hrs.)	2	0	2 (no work date listed)
2 (Clear Within 30 Days)	42	39	3 (no work date listed)
3 (Clear Within 9 Months)	4,068	4,023	45 (no work date listed)
4 (Monitor)	1,541	36 had work date, 1,505 no work date	0

For P2 and P3 trees, when a work date was specified, the work was completed within the designated time frame; however, no work date was listed for the two P1 trees, 3 of the P2 trees, and 45 of the P3 trees. Therefore, Energy Safety could not verify that all work was completed within the designated timeframes. Although no work is required for P4 trees, which were to be monitored for future risk, 36 did receive work (pruning or removal).

Conclusion: Liberty did not provide information consistent with completion of work identified in this statement.

Finding – 8.2.6 Open Work Orders

Liberty did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient.

In its CAP response Liberty must either provide work dates for the P1, P2, and P3 trees that did not have a record of completion, or documentation explaining why the work was either constrained or not required. If Liberty cannot meet its WMP commitments, it must submit documentation describing the constraints which prevented completion and identify the actions it plans to implement to ensure the work is completed in future compliance years.

8.2.7 Workforce Planning

The purpose of this initiative is that “[p]rograms...ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and

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contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”¹²⁸

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 13

Statement: “Liberty continually seeks opportunities to host field trainings, benchmarking, and tailboards on utility arboriculture topics among VM groups to align on industry practices and obtain continuing education units (“CEU”) to keep professional certifications in good standing. Depending on the subject and learning objectives, training will be developed by a combination of Liberty’s highly qualified utility arborists and consultants who are subject matter experts in specific fields within utility vegetation management.”¹²⁹

Supporting Information and Analysis: Liberty provided a spreadsheet which included the names, certified arborist numbers and number of classes attended by its employees in 2024.¹³⁰ Liberty also provided copies of agendas and attendance sheets for its Fall and Spring Benchmark Meetings between Liberty staff and its contractors,¹³¹ as well as syllabi, attendance records, and other training materials from several trainings in 2024 related to fuel management, biodiversity, best practices, and integrated vegetation management practices.¹³²

Conclusion: Liberty provided information consistent with the completion of work identified in this statement.

Finding – 8.2.7 Workforce Planning

Liberty provided information consistent with the completion of work identified in Initiative 8.2.7 Workforce Planning. Therefore, Energy Safety concludes initiative 8.2.7 Workforce Planning is complete.

¹²⁸ [Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 6, 2022, p. A-26 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

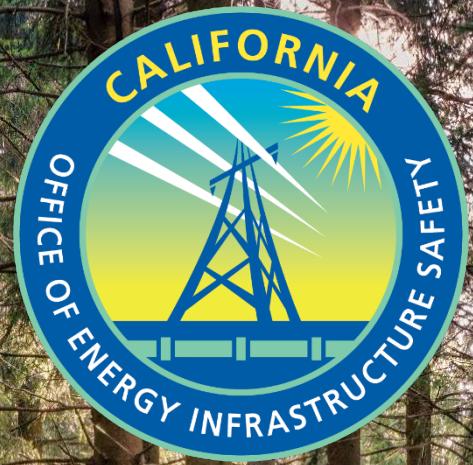
¹²⁹ [Liberty’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true) (July 26, 2024), pp. 252-254 URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true>).

¹³⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 25; attachment: “2024 Training Tracking.xlsx.”

¹³¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 26; attachments: “March 2024 Benchmark Agenda.docx,” “Liberty Benchmark Fall 2024 Agenda.docx,” “Signed Sign In Sheet Winter Benchmark 2024.pdf.”

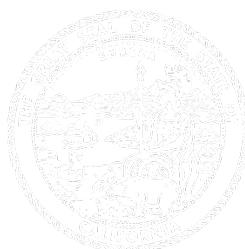
¹³² Data Request OEIS-E-SVM_2025-Liberty-001, Question 26; attachments: “2024.01.22 LUCA Plant Identification and Reading the Landscape for Ground Crews.pdf,” “2024.01.22 LUCA VM Habitat Initiative Syllabus(1).pdf,” “2024.04.30_Biodiversity, IVM & ESG at Liberty Utilities.pdf,” “Utility Tree Risk Assessment – Article and Quiz.pdf,” “Wind and Tree failures.pdf,” “Wood haul flow chard.docx,” “Wood Hauling Worksheet.docx,” “woodhauling_attendance_edited.pdf,” “ISA CEU sign in sheet 12102024.pdf,” Biodiversity, IVM, & ESG at Liberty – Attendance report 4-30-24 (1).txt.”



APPENDIX 2. Liberty 2024 Corrective Action Plan

APPENDIX DESCRIPTION

Liberty submitted its corrective action plan to Energy Safety on October 16, 2025. This appendix reproduces that CAP response in its entirety.



**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
DOCKET 2024-SVM**

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E) 2024 VEGETATION
MANAGEMENT AUDIT RESPONSE**

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

October 16, 2025

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
DOCKET 2024-SVM**

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E) 2024 VEGETATION
MANAGEMENT AUDIT RESPONSE**

Pursuant to the Office of Energy Infrastructure Safety’s (“Energy Safety”) Audit on Liberty’s 2024 Vegetation Management (“VM”) Work, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) submits this 2024 VM Audit Response.

**I. LIBERTY’S RESPONSE RE: WMP INITIATIVE: VM QUALITY
ASSURANCE AND QUALITY CONTROL (WMP-VM-QAQC-01)**

Substantiating QAQC Initiative Completion and Explanation of Pass Rate Targets

Liberty's Vegetation Management (“VM”) Quality Assurance and Quality Control (“QA/QC”) initiative met its intended objectives. The program not only exceeded its reportable quantitative target but also incorporated additional QC activities. Findings from QC inspections were used to complete work in accordance with applicable specifications and standards. Insights gained through QC assessments have been integrated to support continuous improvement in Liberty’s VM program.

Liberty’s annual quantitative target for QA/QC inspections is 229 line miles of completed tree work, as outlined in Table 8-18 of the 2023–2025 Wildfire Mitigation Plan (“WMP”). In 2024, Liberty completed 234 miles of QC inspections, as reported in Quarterly Data Reporting, Table 1. Sample size targets for other QC components that were not included in the reportable metric were also met or exceeded. Liberty has provided all QC records and summary pass rate results for work performed under this initiative.

In response to Data Request (“DR”) No. 22 from OEIS-E-SVM_2025-Liberty-001 for the 2024 SVM Audit, Liberty explained its sample size methodology, which is also detailed in Section 8.2.5 of the 2023–2025 WMP. Each QC component includes condition-specific pass rate targets. Additionally, Liberty provided condition specific and overall pass rates - the average of all criteria evaluated - for each QC component in the file “*2024 QC Summary.xlsx*” in DR No. 22.

While some condition-specific pass rates within individual QC components fell below the goals specified in Table 8-30 of the 2023-2025 WMP, these deviations did not impact the program’s overall effectiveness. Liberty places great emphasis on the overall score for each QC program component when evaluating program effectiveness. In DR No. 22 and 24 from OEIS-E-SVM_2025-Liberty-001, Liberty provided examples of contractor evaluations and supporting correspondence which demonstrate its efforts to improve performance at a systematic level informed by the pass rate methodology.

Additionally, Liberty recognizes the value of analyzing condition-level pass rates to identify opportunities for improvement within each component. As such, QC findings are reviewed, and rework is assigned where applicable. Liberty’s post-work verification process also operates as intended to complete work to standards and specifications. To maintain quality of work, the pass rates are based on work quality goals and not a measure of work completion.

In its 2026–2028 WMP, Liberty updated the pass rate targets for each program component in Table 9-21. Liberty will continue to evaluate specific conditions under each component, as shown in Tables 9-25 through 9-28. The overall pass rate score for each component will remain unchanged and is an average of all evaluated conditions and measured against pass rate targets in Table 9-21.

Explanation of QAQC Records Not Reviewed

As part of Data Request No. 23 (OEIS-E-SVM_2025-Liberty-001), Liberty provided an export of all VM QC records from its QC work management system. The file, titled “2024_VM_QC_All_Data.xlsx,” includes both completed QC inspections and records that did not have a QC inspection occur, identified by the statuses “Pending” and “Not Reviewed.”

Once VM work is completed, records are migrated into the QC work management software for sampling and inspection, if necessary. The objective of QC inspections is to provide reasonable assurance that high quality work is being performed and meeting program requirements. As such, Liberty’s QC process is based on judgmental sampling, not full inspection.

Records that did not undergo QC inspection are excluded from reportable targets, pass rates, and other program performance metrics. Such excluded records include: duplicated QC records, access limitations, or other situational factors.

The 2024 QC records that did not undergo QC inspection were mainly duplicate entries. These duplicates resulted from a manual export process that failed to exclude records already imported into the QC work management software. Additional reasons for non-review include access limitations, such as instances where work had already been completed and no further activity was available for inspection, and other circumstances where a QC inspection was not warranted. Explanations for non-review can be found in the last column labeled ‘Comments’ of each tab from “2024_VM-QC_All_Data.xlsx.” Liberty is exploring ways to automate the process of migrating completed VM records into the QC software to avoid duplicate records and minimize the amount of QC records not reviewed.

II. LIBERTY'S RESPONSE AND CORRECTIVE ACTIONS RE: WMP PROGRAMATTIC AREA: OPEN VM WORK ORDERS

Liberty disagrees with the audit finding of ‘Deficient’ for its Open Work Orders initiative.

To provide clarity, Liberty submitted the file “*2024 Open Work Orders without work date.xlsx*”, which identifies 50 work orders without a recorded work date. Of these:

- 45 work orders are marked with the status “No Work”, indicating no tree work was required.
- 5 work orders are marked as “Completed” but lack a recorded work date. These are detailed in the file “*2024 Open Work Orders complete without work date.xlsx*”.

Root Cause of Missing Work Dates

Liberty’s vegetation management crews typically record time entries in the work management software, which automatically logs the completion date. However, if a work order is manually updated to “Completed” without a time entry, the system does not capture a work date. This explains the missing dates for the five work orders in question.

Liberty conducted a detailed review of the five work orders with missing dates:

Work Order ID	Summary
22e4f4f6-7dd6-4584-8d59-22ca3dca11ae	Completed April 10, 2023, under a separate work order. The 2024 work order was deleted post-sync but retained in Liberty’s internal database.
6b9ef447-3846-4a9d-b0f6-26a937fade24	Manually updated to “Completed” on October 2, 2024.
4f079eb9-3cf9-4253-ade8-f1a065ef870c	Duplicate of work order 0eb1be0b-509c-40e9-815c-c496a12e524f, completed May 10, 2024.
6306d32e-491f-4143-aceb-e66747bbc0ba	Work order comments indicate tree removal was performed by a third party.
49a3cdc5-dd05-44ef-a9f3-aa143d10bd9b	Manually updated to “Completed” on September 24, 2024.

Liberty also conducted post-work verification inspections for these five work orders, confirming that all work was completed. Supporting documentation is provided in “*2024 Work Orders Complete No Work Date – Post Work Verification Records.pdf*.”

Liberty is actively exploring system controls to prevent future instances where a work order is marked “Completed” without a corresponding work date.

III. CONCLUSION

Liberty appreciates this opportunity to provide its response to the Energy Safety 2024 Vegetation Management Audit.

Respectfully submitted,

/s/ Jordan Parrillo

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

October 16, 2025

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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A California Natural Resources Agency
www.energysafety.ca.gov

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Sacramento, CA 95814
916.902.6000

