



Liberty Utilities (CalPeco Electric) LLC
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VIA OEIS E-FILING

Shannon O'Rourke
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
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Subject: Liberty's Response to Notice of Violation - NOV_LU_CAC9_20220804_1232

Deputy Director O'Rourke:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to provide this response to the finding identified in the Notice of Violation - NOV_LU_CAC9_20220804_1232 received on January 23, 2024 based on Energy Safety field inspections conducted in Liberty's service area on August 4, 2022. Liberty also appreciates the Office of Energy Infrastructure Safety's ("Energy Safety") efforts to identify, communicate and work together to resolve potential wildfire risks.

The enclosed response describes corrective actions taken or planned by Liberty to remedy the findings identified in the above notice and prevent recurrence.

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

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Liberty Response

Finding: Failure to set the pole to protocol

Notice	Violation #	Structures
NOV_CAC9_LU_ 20220804_1232	V1	294725

Summary of Finding: “Energy Safety observed that in implementing 2021 WMP initiative number 7.3.3.6, Liberty Utilities failed to adhere to its pole setting installation protocols on pole number 294725. Visual inspection of the base of the pole shows a hole in the earth at the base of the pole approximately three inches in diameter, and an area approximately one foot in diameter around the base that was not filled in or firmly piled up around the base of the pole. Energy Safety considers this violation for failure to adhere to protocol to be in the Moderate risk category.”

Response: Liberty has corrected/remediated this finding. Corrective actions taken to remedy the identified violation and prevent recurrence were backfilling the hole and tamping it down. See pictures below. Additionally, to prevent recurrences, Liberty will review this incident with crews and continue to perform post installation QA/QC to review adherence with its pole setting standards and installation protocols. Liberty will also continue to conduct its asset inspection programs.

