



Liberty Utilities (CalPeco Electric) LLC
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April 16, 2024

VIA OEIS E-FILING

Shannon O'Rourke
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
efiling@energysafety.ca.gov

Subject: Liberty's Response to Notice of Violation - NOV_LU_CAC18_20231025_0916

Dear Deputy Director O'Rourke:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to provide this response to the findings identified in the Notice of Violation (NOV) - NOV_LU_CAC18_20231025_0916 received on March 21, 2024 based on Energy Safety field inspections conducted in Liberty's service area on October 25, 2023. 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 demonstrates that Liberty is not in violation and that no work is required by Liberty at this time related to the Energy Safety findings identified in the above notice.

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

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Tahoe Vista, CA 96148
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Liberty Response

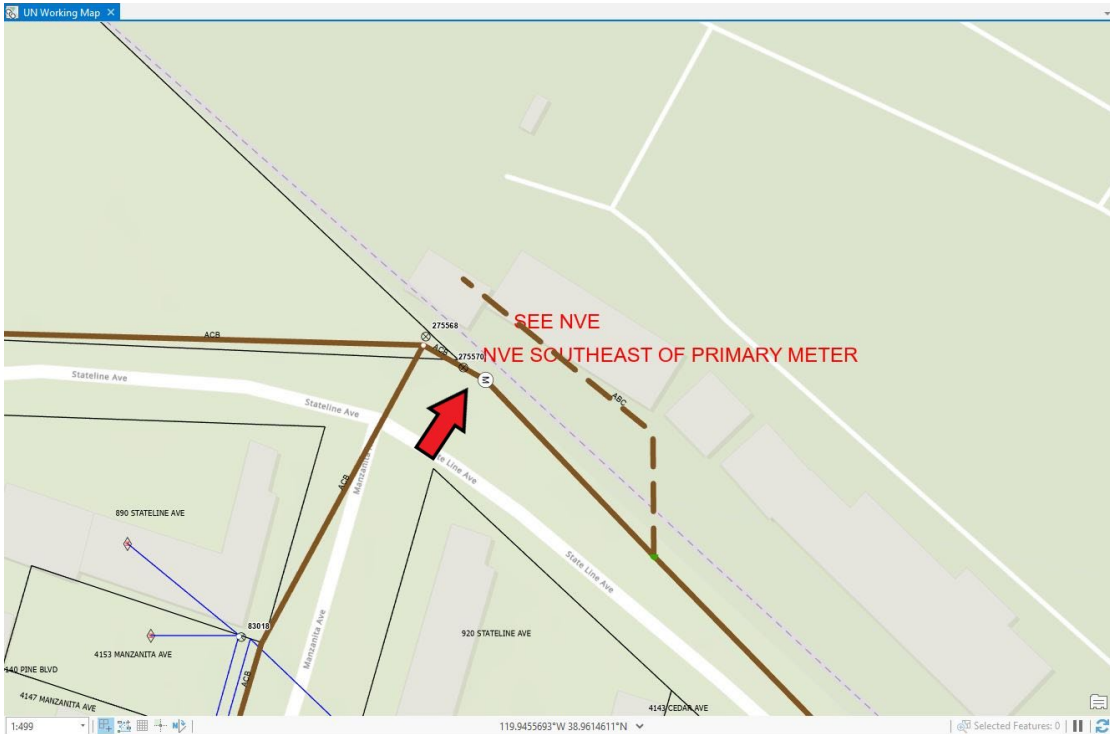
Finding: Failure to set the pole to protocol

Notice	Violation #	Structures
NOV_LU_CAC18_20231025_0916	Violation 1	275568

Summary of Energy Safety Finding:¹ Near pole ID 275568 at 920 Stateline Ave, South Lake Tahoe, CA, 96150, USA, 38.9609062307708, -119.944810162602, the Energy Safety inspector observed two Jeffrey pines within Liberty Utilities’ clearance distance of six feet. The inspector’s observations are documented in Violation 1 photographs. Item1GImg1, Item1GImg2, Item1IA1Img1, and Item1IA1Img2 depict a Jeffrey pine approximately three feet from primary conductors. Photograph numbers Item1IA1Img3 and Item1IA1Img4 depict a Jeffrey pine that is approximately five feet from primary conductors. The radial clearance requirement from these primary conductors (12kV-25kV) is six feet, and Liberty Utilities failed to trim back to 12-15 feet, per Liberty Utilities’ MAT shown in Table 8-23 above.

Response: The radial clearance requirement for vegetation to electrical conductors operating between 2,400 and 72,000 volts per General Order (GO) 95-Rule 35, and Public Resource Code (PRC) 4293 is 4-feet. The tree displayed in ‘Item1Iimg1’ and ‘Item1IA1Img2’ is not located near Liberty’s high voltage lines. East of the switch and meter, on Pole 275570, are NV Energy power lines. Liberty is not responsible for this tree or its clearance from the lines. No work is required by Liberty.

¹ Energy Safety NOV_LU_CAC18_20231025_0916



Regarding the tree displayed in 'Item1IA1Img3' and 'Item1IA1Img4,' no vegetation is within regulated clearance requirements. Bole wood is at 5' to conductors. There is no vegetative growth within Liberty maintenance action thresholds. No work is required by Liberty at this time.

