



Liberty Utilities (CalPeco Electric) LLC
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April 19, 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_20231031_1007

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_20231031_1007 received on March 22, 2024 based on Energy Safety field inspections conducted in Liberty's service area on October 31, 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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Liberty Response

Finding: Failure to achieve required clearance.

Notice	Violation #	Structures
NOV_LU_CAC18_20231031_1007	Violation 1	158410

Summary of Energy Safety Finding:¹ Near pole ID 158410 at 107045 US Highway 395, Coleville, CA, 96107, USA, 38.5128587072477, -119.470726209569, the inspector observed one elm tree approximately three feet and another elm tree approximately five feet below the primary conductors. The inspector’s observations are documented in Violation 1 photographs, which are attachments to the Energy Safety report. Photograph numbers Item1GImg1, Item1GImg2, Item1GImg3, Item1GImg4, and Item1GImg5 depict an elm tree approximately three feet under primary conductors and a second elm tree approximately five feet under 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’ maintenance action threshold (“MAT”) shown in Table 8-23.

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. Liberty’s maintenance action threshold for clearance pruning on conductors operating between 2,400 and 72,000 volts is 6-feet. Vegetation identified between 4 and 6 feet is not a violation of regulated clearance requirements per GO 95-Rule 35 and PRC 4293.

Liberty maintains clearance distances through annual LiDAR inspections and clearance pruning performed by tree crews. Liberty typically performs LiDAR inspections in the Fall and subsequent clearance pruning work occurs between January and July of the following year. Liberty conducted LiDAR inspections on September 4, 2023 for vegetation clearances and performed clearance pruning at the location on January 18, 2024. A QC inspection on April 1, 2024 determined clearance pruning was performed but maintenance clearance distance (“MCD”) was not achieved by tree crew. A tree crew returned on April 5, 2023 to achieve full MCD. A subsequent QC inspection verified MCD was achieved on April 9, 2024. See attached report: QC Report for NOV_LU_CAC18_20231031_1007.

¹ Energy Safety NOV_LU_CAC18_20231031_1007