



Liberty
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

May 20, 2024

VIA OEIS E-FILING

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Docket #2022 NOV

Subject: Liberty's Response to Notice of Violation – NOV_LU_CAC17_20231116

Dear Patrick Doherty:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to provide this response to the finding(s) identified in the "NOV_LU_CAC17_20231116_0839" (Notice of Violation or NOV), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on April 19, 2024, regarding Energy Safety's inspection of work completed by Liberty in accordance with its 2022 Wildfire Mitigation Plan ("WMP"). Liberty also appreciates Energy Safety's continued efforts to identify, communicate, and resolve wildfire risks throughout California.

The enclosed response demonstrates that Liberty is 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:

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

Liberty Response

Finding: Failure to replace expulsion fuses with non-expulsion fuse alternatives / Failure to remove tree attachment(s).

Notice	Violation #	Structures
NOV_LU_CAC17_2023116_0839	Violation 1	292087
NOV_LU_CAC17_2023116_0839	Violation 2	292170
NOV_LU_CAC17_2023116_0839	Violation 3	291897
NOV_LU_CAC17_2023116_0839	Violation 4	292090
NOV_LU_CAC17_2023116_0839	Violation 5	290820

Summary of Energy Safety Findings¹:

Specifically, the NOV describes that on November 16, 2023, Energy Safety conducted an inspection of Liberty’s WMP initiatives in the vicinity of the City of Tahoe Vista and Kings Beach, California, and found the following violations:

Violation 1. Energy Safety observed that in implementing 2022 WMP initiative 7.3.3.7 – Expulsion Fuse Replacement, Liberty Utilities failed to complete the replacement of expulsion fuses with non-expulsion fuse alternatives on pole ID 292087 at coordinates 39.2426041412934, -120.048456796215. Energy Safety considers this violation for failure of completeness to be in the Minor risk category.

Violation 2. Energy Safety observed that in implementing 2022 WMP initiative 7.3.3.7 – Expulsion Fuse Replacement, Liberty Utilities failed to complete the replacement of expulsion fuses with non-expulsion fuse alternatives on pole ID 292170 at coordinates 39.2384877574962, -120.027669287579. Energy Safety considers this violation for failure of completeness to be in the Minor risk category.

Violation 3. Energy Safety observed that in implementing 2022 WMP initiative 7.3.3.12 - Tree Attachment Removal, Liberty Utilities failed to complete a tree attachment removal on pole ID 291897 at coordinates 39.2361242144599, -120.016292223114. Energy Safety considers this violation for failure of completeness to be in the Minor risk category.

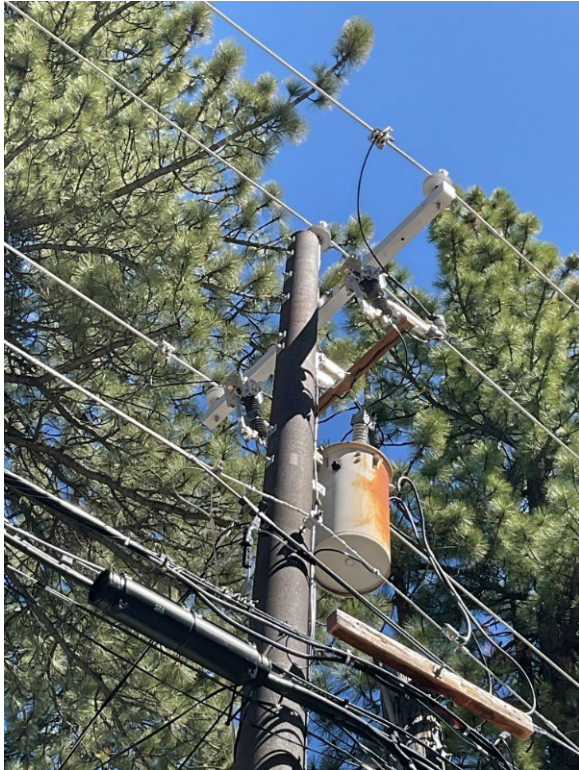
Violation 4. Energy Safety observed that in implementing 2022 WMP initiative 7.3.3.7 – Expulsion Fuse Replacement, Liberty Utilities failed to complete the replacement of existing expulsion fuses with non-expulsion fuse alternatives on pole ID 292090 at coordinates 39.2369406983482, -120.027923542717. Energy Safety considers this violation for failure of completeness to be in the Minor risk category.

Violation 5. Energy Safety observed that in implementing 2022 WMP initiative 7.3.3.7 – Expulsion Fuse Replacement, Liberty Utilities failed to complete the replacement of existing expulsion fuses with non-expulsion fuse alternatives on pole ID 290820 at coordinates 39.2371603131986, -120.028928803064. Energy Safety considers this violation for failure of completeness to be in the Minor risk category.

¹ Energy Safety NOV_LU_CAC17_20231116_0839

Liberty Responses:

Liberty Response 1 - Liberty disagrees with Energy Safety's observation that it failed to complete the replacement of expulsion fuses with non-expulsion fuse alternatives on pole ID 292087 because Liberty did not report that work as completed in its Quarter 3 2023 spatial data report. Additionally, at the time of this response, Liberty has replaced the expulsion fuse on pole ID 292087 with a non-expulsion fuse alternative to reduce wildfire risk. The following photos show the completed work at this location:



Liberty Response 2 - Liberty disagrees with Energy Safety's observation that it failed to complete the replacement of expulsion fuses with non-expulsion fuse alternatives on pole ID 292170 because Liberty did not report that work as completed in its Quarter 3 2023 spatial data report. Additionally, at the time of this response, Liberty has replaced the expulsion fuse on pole ID 292170 with a non-expulsion fuse alternative to reduce wildfire risk. The following photos show the completed work at this location:



Liberty Response 3 - Liberty disagrees with Energy Safety's observation that it failed to complete the removal of a tree attachment on pole ID 291897 because Liberty did complete that tree attachment removal as reported in its Quarter 3 2023 spatial data report. It is possible that Energy Safety's observation was of other tree attachments in the vicinity. The following photos identify the completed work at the pole ID 291897 location:

Photo showing dead tree and related tree attachment prior to removal:



Photo showing that tree attachment and dead tree have been removed:



Map depicting location of removed tree and tree attachment:

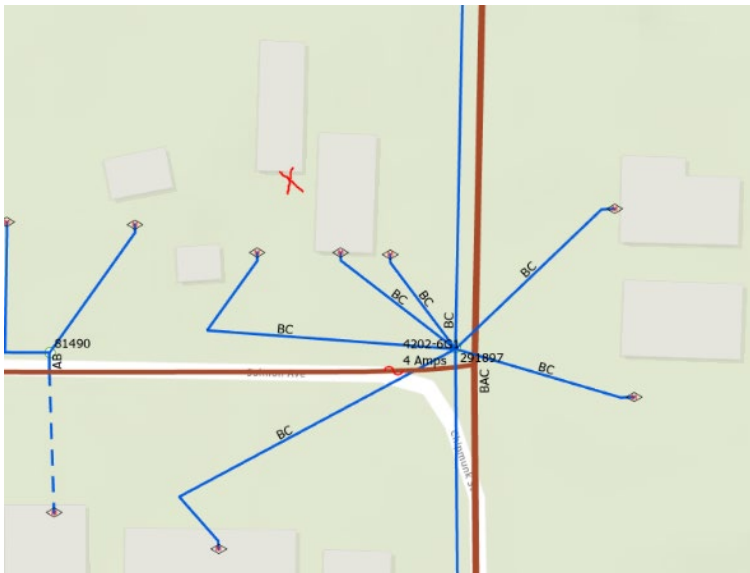


Photo showing pole #291897:



Liberty Response 4 - Liberty disagrees with Energy Safety's observation that it failed to complete the replacement of expulsion fuses with non-expulsion fuse alternatives on pole ID 292090 because Liberty did not report that work as completed in its Quarter 3 2023 spatial data report. Additionally, at the time of this response, Liberty has replaced the expulsion fuse on pole ID 292090 with a non-expulsion fuse alternative to reduce wildfire risk. The following photos show the completed work at this location:



Liberty Response 5 - Liberty disagrees with Energy Safety's observation that it failed to complete the replacement of expulsion fuses with non-expulsion fuse alternatives on pole ID 290820 because Liberty did not report that work as completed in its Quarter 3 2023 spatial data report. Additionally, at the time of this response, Liberty has replaced the expulsion fuse on pole ID 290820 with a non-expulsion fuse alternative to reduce wildfire risk. The following photos show the completed work at this location:

