



Liberty
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May 24, 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_CAC9_20221019_1218

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_CAC9_20221019_1218" (Notice of Violation or NOV), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on April 26, 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
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Liberty Response

Finding: Failure to replace expulsion fuses with non-expulsion fuse alternatives.

Notice	Violation #	Structures
NOV_LU_CAC9_20221019_1218	Violation 1	269464
NOV_LU_CAC9_20221019_1218	Violation 2	269462

Summary of Energy Safety Findings¹:

Specifically, the NOV describes that on October 19, 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 alternatives on pole ID 269464 at coordinates 39.3778635924797, -120.077769974398. 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 alternatives on pole ID 269462 at coordinates 39.3779225383708, -120.078023159941. Energy Safety considers this violation for failure of completeness to be in the Minor risk category.

¹ Energy Safety NOV_LU_CAC9_20221019_1218

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 269464 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 269464 with a non-expulsion fuse alternative to reduce wildfire risk. The following photo shows 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 269462 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 269462 with a non-expulsion fuse alternative to reduce wildfire risk. The following photo shows the completed work at this location:

