



Liberty
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July 12, 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_0839_Revision 1

Dear Mr. Doherty:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to respond to the finding(s) identified in "NOV_LU_CAC17_20231116_0839_Revision 1" (Notice of Violation or NOV), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on June 14, 2024, regarding Energy Safety's inspection of work completed by Liberty in accordance with its 2022 Wildfire Mitigation Plan ("WMP"). Liberty appreciates Energy Safety's continued efforts to identify, communicate, and resolve wildfire risks throughout California.

This 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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Tahoe Vista, CA 96148
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Energy Safety 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_Revision 1	Violation 1	291897

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 7.3.3.12 - 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.

¹ Energy Safety NOV_LU_CAC17_20231116_0839_Revision 1

Liberty Response:

Liberty Response 1 - Liberty disagrees with Energy Safety’s observation that it failed to complete the removal of a tree attachment on pole ID 291897 that it reported in its Quarter 3 and Quarter 4 2022 spatial data report. Liberty did complete that tree attachment removal as reported in its Quarter 4 2022 spatial data report. The photos below identify the completed work at the pole ID 291897 location. Energy Safety states that “Energy Safety understood Liberty Utilities’ QDR submission to mean that all tree attachments would be removed from this location.”² However, Liberty’s QDR submission reported only one tree attachment removal completed at this location.

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



² Energy Safety NOV_LU_CAC17_20231116_0839_Revision 1

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



Map depicting location of removed tree and tree attachment:

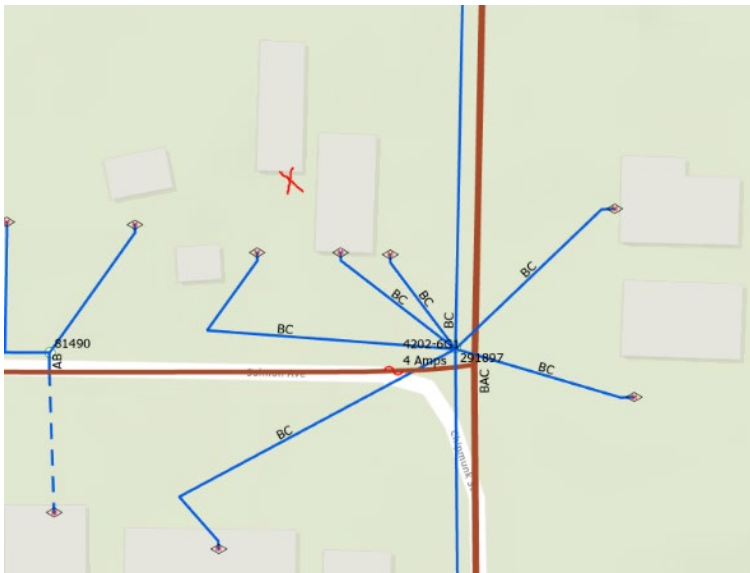


Photo showing pole #291897:

