



Liberty Utilities (CalPeco Electric) LLC
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November 22, 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_ESD_LU_KJO_20241008_0823

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_ESD_LU_KJO_20241008_0823 received on October 31, 2024 based on Energy Safety field inspections conducted in Liberty's service area on October 8, 2024. 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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Manager of Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
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Tahoe Vista, CA 96148
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Liberty Response

Finding: Failure to achieve “Maintenance Clearance Distance” as described in Liberty’s WMP

Notice	Violation #	Structures
NOV ESD LU KJO 20241008 0823	Violation 1	Near Pole 286848

Summary of Energy Safety Finding:¹ Liberty’s Q2 QDR reported that work to achieve a 12-foot radial clearance distance (WMP-VM-VFM-05 initiative number 8.2.3.3) for trees along this span was completed in May 2024. At 0.1 span north of pole ID 286848 (in front of 8465 Cutthroat Avenue in Kings Beach), near GPS coordinates 39.242530, -120.023469, the inspector observed a Jeffrey pine (*Pinus jeffreyi*) with limbs within 12 feet of conductors. The inspector measured the distance between the pine and the conductor with a Nikon Forestry Pro II laser rangefinder. One limb overhanging above the lines measured approximately 6.5 feet away from the covered conductors. The inspector observed clearance work along this span, including at the subject tree. However, this pine was not trimmed enough to achieve the “Maintenance Clearance Distance” as outlined in the WMP.

Liberty Response: Liberty reviewed its 2024 Q2 QDR data submitted, LiDAR inspection records, completed work order data for its Clearance initiative, and conducted a field review of the subject tree in question on October 31st, 2024. Liberty determined that there is no violation of “failure to achieve maintenance clearance distance” as described in the WMP.

A Remote Sensing Inspection (LiDAR) conducted on September 4th, 2023, identified subject tree (Tree ID# W120023445N39242578) at 8.85 distance in feet to conductors as flown. Liberty’s maintenance action threshold (MAT) for conducting clearance pruning is when vegetation encroaches within 6 feet to conductors. Because the subject tree was not identified within Liberty’s MAT, and no other vegetation was identified within 6 feet of conductors between poles 77288-286848 (Span ID KBH4202+W12002343N3924253-W12002394N3924252) and 286848-77290 (Span ID KBH4202+W12002289N3924252-W12002343N3924253), Liberty did not mobilize vegetation management crews to perform clearance pruning work in 2024 at this location due to adequate clearances already established. See Attachment 1: 2023_LiDAR_Tree_Data re NOV ESD_LU_KJO_20241008_0823 for reference.

Liberty submits project completion data for its initiatives as line segment data and vegetation project points for vegetation management work performed in its QDR. No vegetation project point for work performed on the subject tree or location was included in the 2024 Q2 QDR submittal. Because adequate clearances were already established at the location, Liberty reported completed line miles for its clearance initiative in 2024 Q2 QDR, as provided in “LU_VegetationManagementProjectLine_2024_Q2” GIS file. See Figure 1: 2024 Q2 QDR VM Map for NOV_LU_KJO_20241008_0823.

¹ Energy Safety NOV_ESD_LU_KJO_20241008_0823

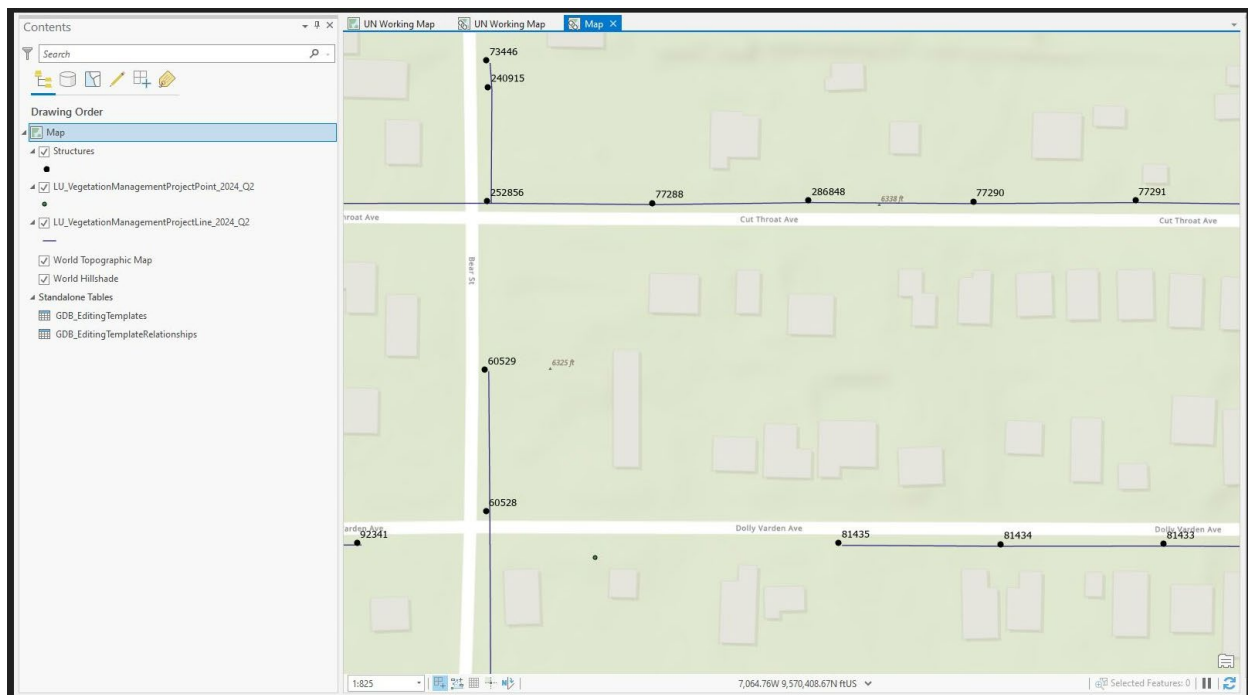
A LiDAR inspection conducted on August 13th, 2024, on the subject tree determined a clearance distance of 7.7 feet to conductors as flown, indicating the subject tree has not yet encroached Liberty's maintenance action threshold for conducting clearance pruning. See Figure 2: 2024_LiDAR re NOV ESD_LU_KJO_20241008_0823.

Liberty conducted a field assessment of the subject tree and location on October 31st, 2024. Upon inspecting the tree, Liberty's arborist agrees with the recent LiDAR inspection and that the current clearance of the closest branch above conductors is 7.7 feet and the pruning cuts observed on the tree were made several years ago and not from work performed in 2024.

Liberty also verified historical records of vegetation maintenance at the location and determined the last time the subject tree was pruned was June 17, 2020. See Figure 3: VMS_Work_Order re NOV ESD_LU_KJO_20241008_0823.

Liberty will continue to monitor the tree for encroachment to maintenance action thresholds and conduct clearance pruning when necessary.

Figure 1: 2024 Q2 QDR VM Map for NOV _LU_KJO_20241008_0823



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Figure 2: 2024_LiDAR re NOV ESD_LU_KJO_20241008_0823

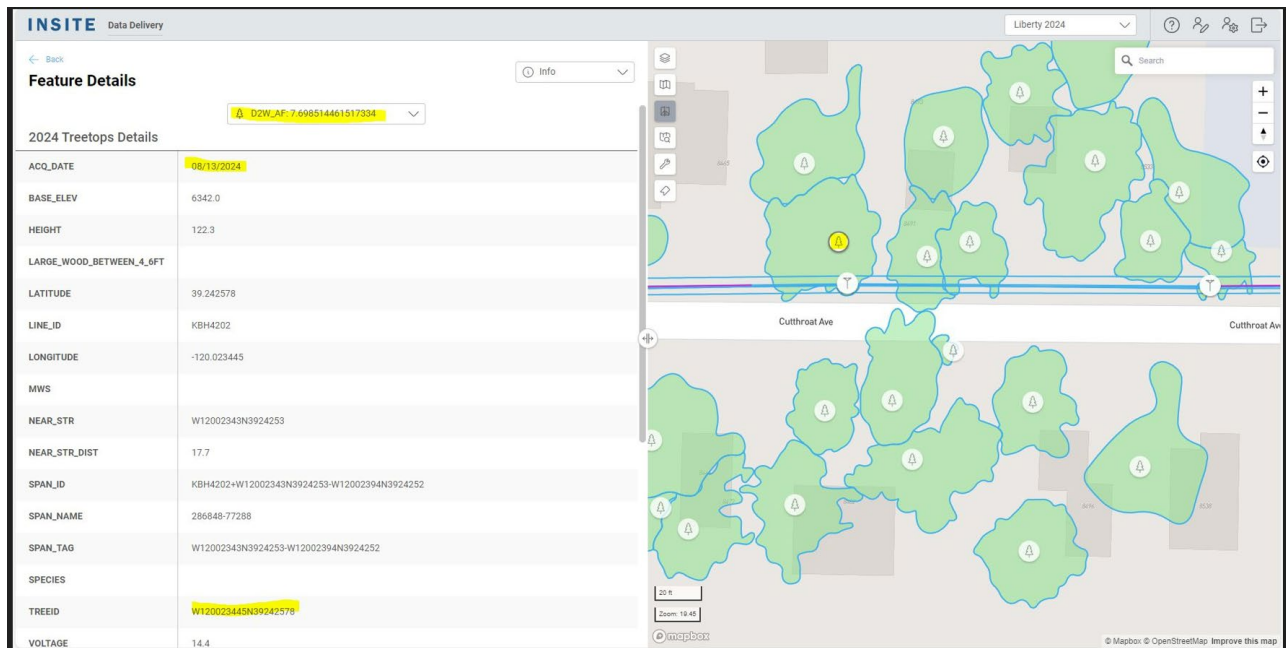


Figure 3: VMS_Work_Order re NOV ESD_LU_KJO_20241008_0823

WR-BROCKWAY 4202-1-1000-200610

Inspector Data (this data must be entered and updated in Inframap): Inspector: Paul Scannapieco

INSIP Date: 7/2/2019

Division: North Lake Circuit: BROCKWAY 4202 Section: 1 Pole ID: 77288 Work Packet No: 1000 Routing: 75

Area: KINGS BEACH Location Type: Residential Ownership Type: Private Account Type: Routine

Parcel No: 090-092-045-000 Address: 8465 CUTTHROAT AVE City: KINGS BEACH County: PLACER FPR: SRA

Tree Species: Pine - Jeffrey DBH: 27 Units: 1 Trunks: 1 Height Class: 100 Row Position: Outside Span Location: End

Hazards: FUTURE GROW-ING Failure Probability: LOW Trim Type: SD SEZ: No Growth Rate: SLOW (<1"/YEAR)

Required Clearance: 12 Cleanup Method: CHIP & HAUL Crew Type: Lift 75' Mfr Wood Stems: No Priority: Routine

Other Utility Involved: Alerts: PI Comments: LOL

LPR: No Request Type: Landowner Contact 1 Info: Name: BERVIO ERIC J TR Address: PO BOX 1146 KINGS BEACH, CA 96143 Email: Phone: VMS Phone: Contact Type: Landowner Contact 2 Info: Name: Address: Email: Phone: Access: SPAN IFO 8465 CUTTHROAT AVE

VMS Data: Tree #: 65587

Project Name: Status: COMPLETED Status Date: 6/23/2020 1:29:17 PM WR Number: WR-BROCKWAY 4202-1-1000-200610

Date NOI: Date Complete: 6/17/2020 WR Generated On: 6/10/2020

Date Permitted: 7/2/2019 Status By: Hoeffler, Brandon Database Notes:

Contractor: MFE Tree Foreman: KJ Rate Type: Unit Job #: 7926

Invoice No: 27984 Invoice Date: 6/24/2020 Link to Invoice:

Scan File: OM Scan File: Image:

Form View FILTERED

Attachment 1: 2023_LiDAR_Tree_Data re NOV ESD_LU_KJO_20241008_0823

SPAN_ID		LINE_ID	VOLTAGE	SPAN_NA	SPAN_TAG	OFF	NEAR_STR	NEAR_STR_LATITUDE	LONGITUDE	SPECIES	HEIGHT	DBH	MWS	LARGE_WC	VEGETATIC	WORK_TY	ACQ_DATE	BASE_ELEV	Section	TREE_HEALTH	RISK_SCORE	LEAN_DES	LEAN_SPA	LEAN	LEAN_DIR	DC_FL	AF	D2W_AF	DC_OH	AF_DC	AF_Lean
W120023363N3924239	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	49.11959	W1200234	52.90557	39.2423955	-120.0233639	132.1108						04/09/23	6336.349	1	Healthy	100	N/A				FI_ZONE_1	16.06201553	N/A	N/A		
W120023335N3924232	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	73.56374	W1200234	78.70883	39.24232824	-120.023335	131.1428						04/09/23	6333.997	1	Healthy	35	<5 Deg.	64	1.75	63	FI_ZONE_1	54.00678253	N/A	N/A		
W120023311N3924256	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	12.31812	W1200234	35.82602	39.24256395	-120.0233132	111.2027						04/09/23	6340.817	1	Healthy	100	<5 Deg.	166	2.62	345	FI_ZONE_1	7.797111988	N/A	GI_ZONE_4		
W120023288N3924270	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	61.88319	W1200234	74.06343	39.24269992	-120.0232873	95.3925						04/09/23	6345.178	1	Healthy	24	N/A			FI_ZONE_1	42.72429276	N/A	N/A			
W120023285N3924245	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	28.0549	W1200234	51.38284	39.24245295	-120.0232809	69.2451						04/09/23	6337.765	1	Healthy	24	N/A			FI_ZONE_1	26.24733353	N/A	N/A			
W120023249N3924257	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	17.18662	W1200234	54.35904	39.24257702	-120.0232498	129.4312						04/09/23	6341.549	1	Healthy	100	<5 Deg.	95	2.69	274	FI_ZONE_1	6.398931503	N/A	GI_ZONE_4		
W120023175N3924275	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	79.86496	W1200234	107.4478	39.24274878	-120.0231768	96.6606						04/09/23	6345.579	1	Healthy	24	N/A			FI_ZONE_1	67.48126221	N/A	N/A			
W120023160N3924222	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	111.9263	W1200228	134.2598	39.24222208	-120.0231567	134.7373						04/09/23	6332.273	1	Healthy	35	N/A			FI_ZONE_1	108.3754196	N/A	N/A			
W120023153N3924239	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	49.24643	W1200228	88.06131	39.24239415	-120.0231514	105.3674						04/09/23	6337.243	1	Healthy	100	N/A			FI_ZONE_1	25.91152382	N/A	N/A			
W120023059N3924277	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	125.42	W1200228	138.4789	39.24287349	-120.0230971	97.9451						04/09/23	6349.905	1	Healthy	1	<5 Deg.	14	0.65	165	FI_ZONE_3	99.48001099	N/A	N/A		
W120023062N3924267	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	51.91747	W1200228	70.91716	39.2426715	-120.023062	111.8684						04/09/23	6344.322	1	Healthy	35	<5 Deg.	49	0.84	130	FI_ZONE_1	13.29397774	N/A	N/A		
W120022998N3924232	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	76.27121	W1200228	81.84743	39.24231924	-120.022999	118.1077						04/09/23	6333.912	1	Healthy	35	<5 Deg.	62	0.69	297	FI_ZONE_1	57.4432869	N/A	N/A		
W120022981N3924257	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	18.47407	W1200228	30.94278	39.24257929	-120.0229798	120.0938						04/09/23	6341.766	1	Healthy	100	<5 Deg.	121	3.01	300	FI_ZONE_1	13.8542738	N/A	N/A		
W120022938N3924263	KBH4202+W12002289N3924252-W12002343N3924253	KBH4202	14.4	-	W12002289N3924	39.28865	W1200228	41.34405	39.24263624	-120.0229372	98.8543						04/09/23	6343.556	1	Healthy	35	N/A			FI_ZONE_1	12.7656498	N/A	N/A			
W120023882N3924223	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	116.6313	W1200239	117.8172	39.24220583	-120.0238798	113.6825						04/09/23	6327.938	1	Healthy	9	<5 Deg.	156	4.25	154	FI_ZONE_2	103.7278519	N/A	N/A		
W120023794N3924263	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	39.63484	W1200239	58.25444	39.24263579	-120.0237952	65.0417						04/09/23	6341.478	1	Healthy	35	N/A			FI_ZONE_1	28.73087692	N/A	N/A			
W120023786N3924239	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	47.3979	W1200239	64.55109	39.24239689	-120.0237872	87.6678						04/09/23	6335.552	1	Healthy	100	N/A			FI_ZONE_1	29.82265282	N/A	N/A			
W120023722N3924234	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	65.0514	W1200239	89.42083	39.24234906	-120.0237244	138.8904						04/09/23	6333.7	1	Healthy	100	N/A			FI_ZONE_1	41.42919922	N/A	N/A			
W120023712N3924227	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	93.01289	W1200239	113.4223	39.24227242	-120.0237106	108.4767						04/09/23	6330.583	1	Healthy	9	N/A			FI_ZONE_1	93.41201019	N/A	N/A			
W120023671N3924224	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	101.4655	W1200234	122.8474	39.24224961	-120.0236721	115.9351						04/09/23	6328.965	1	Healthy	9	<5 Deg.	49	3.89	47	FI_ZONE_1	95.92427063	N/A	N/A		
W120023511N3924227	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	92.45104	W1200234	95.24058	39.24227604	-120.0235087	122.5871						04/09/23	6332.223	1	Healthy	24	N/A			FI_ZONE_1	76.71363068	N/A	N/A			
W120023496N3924266	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	50.29569	W1200234	53.22985	39.24266814	-120.0234962	105.6599						04/09/23	6343.54	1	Healthy	24	<5 Deg.	141	3.8	319	FI_ZONE_1	31.15395164	N/A	N/A		
W120023464N3924238	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	53.24882	W1200234	54.17108	39.24238413	-120.0234649	118.9869						04/09/23	6336.483	1	Healthy	100	<5 Deg.	82	0.58	80	FI_ZONE_1	36.95050812	N/A	N/A		
W120023445N3924257	KBH4202+W12002343N3924253-W12002394N3924252	KBH4202	14.4	-	W12002343N3924	17.07026	W1200234	17.379	39.24257743	-120.0234446	121.4834						04/09/23	6341.987	1	Healthy	100	<5 Deg.	143	1.8	35	FI_ZONE_1	8.855731964	N/A	GI_ZONE_4		