

Liberty Utilities (CalPeco Electric) LLC 933 Eloise Avenue South Lake Tahoe, CA 96150 Tel: 800-782-2506 Fax: 530-544-4811

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:

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

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 12foot 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 it's 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

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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.

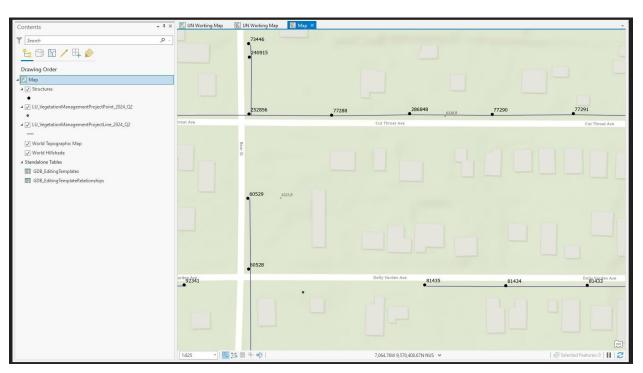
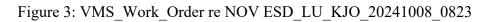


Figure 1: 2024 Q2 QDR VM Map for NOV _LU_KJO_20241008_0823

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ACQ_DATE	08/13/2024			
BASE_ELEV	6342.0		· · · ·	
HEIGHT	122.3			
LARGE_WOOD_BETWEEN_4_6FT				
LATITUDE	39.242578			
LINE_ID	KBH4202	G	Cutthroat Ave	Cutthroat Aw
LONGITUDE	-120.023445			
MWS				
NEAR_STR	W12002343N3924253			2
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Figure 2: 2024_LiDAR re NOV ESD_LU_KJO_20241008_0823



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Attachment 1: 2023_LiDAR_Tree_Data re NOV ESD_LU_KJO_20241008_0823

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W120023363N3924239!KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 49.11959 W1200234 52.90557 39.2423955 -120.4	0.0233639 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 - W12002289N39242 73.56374 W1200234 78.70883 39.24232824 -120	20.023335 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 - W12002289N39242 12.31812 W1200234 35.82602 39.24256395 -120.4	0.0233132 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 - W12002289N39242 61.88319 W1200234 74.06343 39.24269992 -120.4	0.0232873 95.3925	04/09/23 6345.178 1	Healthy 24 N/A		FI_ZONE_1	<mark>42.72429276</mark> N/A N/A
W120023285N39242451KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 28.0549 W1200234 51.38284 39.24245295 -120.	0.0232809 69.2451	04/09/23 6337.765 1	Healthy 24 N/A		FI_ZONE_1	<mark>26.24733353</mark> N/A N/A
W120023249N39242577KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 17.18662 W1200234 54.35904 39.24257702 -120.	0.0232498 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 - W12002289N39242 79.86496 W1200234 107.4478 39.24274878 -120.	96.6606	04/09/23 6345.579 1	Healthy 24 N/A		FI_ZONE_1	<mark>67.48126221</mark> N/A N/A
W120023160N39242221KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 111.9263 W1200228 134.2598 39.24222208 -120.	0.0231567 134.7373	04/09/23 6332.273 1	Healthy 35 N/A		FI_ZONE_1	<mark>108.3754196</mark> N/A N/A
W120023153N3924239:KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 49.24643 W1200228 88.06131 39.24239415 -120.	0.0231514 105.3674	04/09/23 6337.243 1	Healthy 100 N/A		FI_ZONE_1	<mark>25.91152382</mark> N/A N/A
W120023059N39242774KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 125.42 W1200228 138.4789 39.24287349 -120.	0.0230971 97.9451	04/09/23 6349.905 1	Healthy 1 <5 Deg.	14 0.	65 165 FI_ZONE_3	<mark>99.48001099</mark> N/A N/A
W120023062N39242671KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 51.91747 W1200228 70.91716 39.2426715 -120	20.023062 111.8684	04/09/23 6344.322 1	Healthy 35 <5 Deg.	49 0.	84 130 FI_ZONE_1	<mark>13.29397774</mark> N/A N/A
W120022998N3924232(KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 76.27121 W1200228 81.84743 39.24231924 -120	20.022999 118.1077	04/09/23 6333.912 1	Healthy 35 <5 Deg.	62 0.	69 297 FI_ZONE_1	<mark>57.4432869</mark> N/A N/A
W120022981N3924257{KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 18.47407 W1200228 30.94278 39.24257929 -120.	0.0229798 120.0938	04/09/23 6341.766 1	Healthy 100 <5 Deg.	121 3.	01 300 FI_ZONE_1	<mark>13.8542738</mark> N/A N/A
W120022938N39242635KBH4202+W12002289N3924252-W12002343N3924253	KBH4202 14.4 - W12002289N39242 39.28865 W1200228 41.34405 39.24263624 -120.	0.0229372 98.8543	04/09/23 6343.556 1	Healthy 35 N/A		FI_ZONE_1	12.7656498 N/A N/A
W120023882N39242237KBH4202+W12002343N3924253-W12002394N3924252	KBH4202 14.4 - W12002343N39242 116.6313 W1200235 117.8172 39.24220583 -120.	0.0238798 113.6825	04/09/23 6327.938 1	Healthy 9 <5 Deg.	156 4.	25 154 FI_ZONE_2	<mark>103.7278519</mark> N/A N/A
W120023794N39242634KBH4202+W12002343N3924253-W12002394N3924252	KBH4202 14.4 - W12002343N39242 39.63484 W1200235 58.25444 39.24263579 -120.	0.0237952 65.0417	04/09/23 6341.478 1	Healthy 35 N/A		FI_ZONE_1	28.73087692 N/A N/A
W120023786N39242395KBH4202+W12002343N3924253-W12002394N3924252	KBH4202 14.4 - W12002343N39242 47.3979 W1200235 64.55109 39.24239689 -120.	0.0237872 87.6678	04/09/23 6335.552 1	Healthy 100 N/A		FI_ZONE_1	<mark>29.82265282</mark> N/A N/A
W120023722N3924234{KBH4202+W12002343N3924253-W12002394N3924252	KBH4202 14.4 - W12002343N39242 65.0514 W1200235 89.42083 39.24234906 -120.	0.0237244 138.8904	04/09/23 6333.7 1	Healthy 100 N/A		FI_ZONE_1	<mark>41.42919922</mark> N/A N/A
W120023712N39242271KBH4202+W12002343N3924253-W12002394N3924252	KBH4202 14.4 - W12002343N39242 93.01289 W1200235 113.4223 39.24227242 -120.	0.0237106 108.4767	04/09/23 6330.583 1	Healthy 9 N/A		FI_ZONE_1	<mark>93.41201019</mark> N/A N/A
W120023671N3924224{KBH4202+W12002343N3924253-W12002394N3924252	KBH4202 14.4 - W12002343N39242 101.4655 W1200234 122.8474 39.24224961 -120.	0.0236721 115.9351	04/09/23 6328.965 1	Healthy 9 <5 Deg.	49 3.	89 47 FI_ZONE_1	<mark>95.92427063</mark> N/A N/A
W120023511N3924227{KBH4202+W12002343N3924253-W12002394N3924252	KBH4202 14.4 - W12002343N39242 92.45104 W1200234 95.24058 39.24227604 -120.	0.0235087 122.5871	04/09/23 6332.223 1	Healthy 24 N/A		FI_ZONE_1	76.71363068 N/A N/A
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W120023464N39242385KBH4202+W12002343N3924253-W12002394N3924252	KBH4202 14.4 - W12002343N39242 53.24882 W1200234 54.17108 39.24238413 -120.	0.0234649 118.9869	04/09/23 6336.483 1	Healthy 100 <5 Deg.	82 0.	58 80 FI_ZONE_1	<mark>36.95050812</mark> N/A N/A
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