



Liberty
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January 23, 2025

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 #2023 NOV

Subject: Liberty's Response to Notice of Violation – NOV_CAD_LU_CAC22_20240711_1406

Dear Patrick Doherty:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to provide this response to the finding(s) identified in the NOV_CAD_LU_CAC22_20240711_1406 (Notice of Violation or NOV), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on December 24, 2024, regarding Energy Safety's inspection of work completed by Liberty in accordance with its 2023 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 has addressed the Energy Safety findings identified in the above notice and no additional work is required by Liberty at this time.

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: Inaccurate data provided on covered conductor installation.

Notice	Violation #	Structures
NOV_CAD_LU_CAC22_20240711_1406	Violation 1	296777

Summary of Energy Safety Finding¹:

Specifically, the NOV describes that on July 11, 2024, Energy Safety conducted an inspection of Liberty Utilities' WMP initiatives in the vicinity of the city of the city of Homewood, California, and found the following violation:

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.1 - Covered Conductor Installation, LU failed to provide accurate data in reporting that covered conductor was installed and continued to the next pole in the northern direction from Pole ID 296777, Grid Hardening ID TAH7300 Phase 8, at coordinates 39.07930181517026, -120.15769778123013.

Liberty Response:

Liberty's WMP GIS submission for Quarter 4 2023 included inaccurate data for the TAH7300 Phase 8 Covered Conductor project. Specifically, Liberty incorrectly included the span identified by OEIS in this notice as part of the project. Upon receipt of this notice and subsequent review by Liberty's GIS team, Liberty determined that the span identified by OEIS in this notice should have been reported as part of the TAH7300 Phase 9 project, completed in 2024. Liberty has corrected the data entry error and has provided updated GIS files for both the TAH7300 Phase 8 and Phase 9 covered conductor projects with this NOV response.

¹ NOV_CAD_LU_CAC22_20240711_1406