



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, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Docket #2024 NOV

**Subject:** Liberty's Response to Notice of Violation – NOV\_CAD\_LU\_CAC17\_20241016\_0916

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\_CAC17\_20241016\_0916 (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:

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Manager of Regulatory Affairs  
Liberty Utilities (CalPeco Electric) LLC  
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**Energy Safety Finding:** Incorrect data provided on transmission H-structure reported as distribution pole.

Notice	Violation #	Structures
NOV_CAD_LU_CAC17_20241016_0916	Violation 1	296943
NOV_CAD_LU_CAC17_20241016_0916	Violation 2	296938

**Summary of Energy Safety Finding<sup>1</sup>:**

Specifically, the NOV describes that on October 16, 2024, Energy Safety conducted an inspection of LU’s WMP initiatives in the vicinity of the city of South Lake Tahoe, California, and found the following violations:

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.3 - Distribution Pole Replacements, LU failed to provide accurate data in reporting distribution work completed on transmission Pole ID 296943, Grid Hardening ID c08ef8ff-b904-4b2c-9b7a-f5ec4d02185e, at coordinates 38.891428, -119.958043.

Violation 2. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.3 - Distribution Pole Replacements, LU failed to provide accurate data in reporting distribution work completed on transmission Pole ID 296938, Grid Hardening ID 3e844e3d-4274-4b58-b89f-4d9b01e6d81f, at coordinates 38.885092, -119.970193.

**Liberty Responses:**

**Liberty Response 1:**

Subsequent to replacement, Liberty incorrectly entered Pole ID 296943 as a distribution pole instead of a transmission pole in its GIS system. Liberty has corrected the data entry error and has provided updated GIS files for Pole ID 296943 with this NOV response.

**Liberty Response 2:**

Subsequent to replacement, Liberty incorrectly entered Pole ID 296938 as a distribution pole instead of a transmission pole in its GIS system. Liberty has corrected the data entry error and has provided updated GIS files for Pole ID 296938 with this NOV response.

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<sup>1</sup> NOV\_CAD\_LU\_CAC17\_20241016\_0916