

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
DOCKET 2023-SVM**

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E) 2023 SUBSTANTIAL
VEGETATION MANAGEMENT AUDIT RESPONSE**

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Pursuant to the Office of Energy Infrastructure Safety’s (“Energy Safety”) Audit on Liberty’s Substantial 2023 Vegetation Management (“SVM”) Work, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) submits this 2023 SVM Audit Response.

**I. LIBERTY’S RESPONSE RE: WMP INITIATIVE: FALL-IN MITIGATION
(WMP-VM-VFM-06)**

Liberty did complete all work for WMP initiative: Fall-In Mitigation (WMP-VM-VFM-06), and thus disagrees with Energy Safety’s determination that Liberty did not. Liberty provides the following clarification on the data reviewed and the completion of work orders.

1. Misalignment of Data Reviewed:

Energy Safety’s audit refers to data from LiDAR inspections and ground-based inspections. These are separate programs from Liberty’s Fall-In Mitigation initiative. Specifically:

- **LiDAR Inspections:** The audit refers to 4,084 total vegetation compliance issues identified through LiDAR inspections. However, LiDAR inspections are not the method used to identify trees requiring work in the Fall-In Mitigation initiative. The dataset provided for DR 272, Question 2, is not specific to Fall-In Mitigation work completed in 2023 and therefore, should not be used by Energy Safety to evaluate this initiative.

- **Ground-Based Inspections:** The audit references 5,626 instances of vegetation compliance issues identified through ground-based inspections. This dataset is not specific to Fall-In Mitigation work completed in 2023 and thus should not be used to evaluate this initiative. This data includes inspection records for various projects, including special projects and the retainer and monitoring of trees, which would not have completion dates recorded.

2. Completion of Work Orders:

Liberty's records show that all work orders were completed on projects contributing to the total circuit miles reported for Fall-In Mitigation. Ground-based detailed inspections (WMP-VM-INSP-01) and patrol inspections (WMP-VM-INSP-02) are the inputs for Fall-In Mitigation (WMP-VM-VFM-06) work. Liberty has identified a misalignment in the data reviewed by Energy Safety, and requests that the data be re-evaluated with the correct inspection types and project classifications.

3. Updated Data Sheets:

To address the discrepancies noted in the audit, Liberty is providing updated data sheets that include inspection types (patrol, detailed), project types (routine maintenance), tree IDs, inspection dates, and completion dates. These updated records will clarify the completion of work orders for the Fall-In Mitigation initiative. Refer to supporting materials: 2023_SVM_Audit_Liberty Response Fall-In Mitigation Completed Work.

II. LIBERTY’S RESPONSE RE: WMP INITIATIVE: SUBSTATION DEFENSIBLE SPACE (WMP-VM-VFM-03)

Liberty completed all work for WMP initiative: Substation Defensible Space, and thus, disagrees with Energy Safety’s determination that it did not. Liberty’s annual target for this initiative was to conduct work on 12 substations.

Liberty successfully inspected and performed necessary work on all 12 substations in 2023. Documentation of inspections and maintenance for each substation has been provided. While two site visits were implemented for most substations, the Portola and Stampede substations had only one site visit each due to restricted access during substation rebuild construction activities. These substations resumed normal maintenance cycles post-construction.

III. LIBERTY’S RESPONSE RE: WMP INITIATIVE: HIGH-RISK SPECIES (WMP-VM-VFM-07)

See Liberty Response to Fall-In Mitigation (WMP-VM-VFM-06).

IV. LIBERTY’S RESPONSE RE: WMP INITIATIVE: VM QUALITY ASSURANCE AND QUALITY CONTROL (WMP-VM-QAQC-01)

Liberty completed all work for the VM Quality Assurance and Quality Control (“QA/QC”) initiative, and thus disagrees with Energy Safety’s determination that it did not. Liberty’s annual quantitative target for its QA/QC program is 229 line miles of QC inspections, as detailed in Table 8-18 of Liberty’s 2023-2025 WMP. In 2023, Liberty completed 299.7 miles of QC inspections for this target, as reported in its Q4 2023 quarterly data reporting, Table 1. Additionally, Liberty exceeded sample size units for its other QC program components that were not included in the reportable quantitative target in 2023. Liberty has provided QC records, project tracking data, and QC pass results summary for all work performed in this initiative.

Liberty places a high value on work quality in its Vegetation Management Program. Liberty set target pass rates, as displayed in Table 8-20 of Liberty’s 2023-2025 WMP, as a goal

for measuring work quality. Liberty reviews all QC findings and assigns vegetation management crews to perform rework for QC failures where applicable. Liberty's post-work verification process operates as intended to complete all work to Liberty standards and specifications. The pass rate target is Liberty's work quality goal, and not a measurement of work completed.

**V. LIBERTY'S RESPONSE AND CORRECTIVE ACTIONS RE: WMP
PROGRAMMATIC AREA: OPEN VM WORK ORDERS**

Liberty disagrees with Energy Safety's determination that it did not complete all work related to open VM work orders. Liberty provided data displaying work orders categorized by priority, the date created, and the date completed as requested in DR 272, Questions 7, 8, 9, and 10. Of the total 2,882 work orders, 69 work orders (2% of the total) were completed outside of Liberty's mitigation timelines. In Section 8.2.6 of Liberty's 2023-2025 WMP, Liberty explains there are some circumstances where the timeline for mitigation cannot be met, and how Liberty manages those circumstances.

Liberty has implemented a tracking mechanism to alert vegetation management managers when work orders are approaching their due dates to manage work order completion. Liberty continues to manage open work orders to perform the remediation as described in its WMP.

VI. CONCLUSION

Liberty appreciates this opportunity to provide its 2023 Substantial Vegetation Management Audit Response.

Respectfully submitted,

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