



June 17, 2025

Eric Schwarzrock  
President  
Liberty Utilities (CalPeco Electric), LLC  
701 National Ave  
Tahoe Vista, CA 96148

**SUBJECT: Office of Energy Infrastructure Safety Decision for Liberty Utilities, LLC (Liberty)'s 2025 Change Order Request pertaining to its 2025 Wildfire Mitigation Plan Update**

Mr. Schwarzrock:

The Office of Energy Infrastructure Safety (Energy Safety) has evaluated Liberty Utilities' (Liberty) change order request pertaining to its 2025 Wildfire Mitigation Plan (WMP) Update pursuant to the Revised 2023-2025 WMP Process and Evaluation Guidelines (Feb. 1, 2024).<sup>1</sup> Energy Safety rejects Liberty's change order request.

On April 8, 2025, Energy Safety approved Liberty's 2025 WMP Update.<sup>2</sup> Liberty submitted a change order request on April 22, 2025.<sup>3, 4</sup> Energy Safety received no stakeholder comments on Liberty's change order request.

Below, Energy Safety provides a summary of its determination for each of the requested changes. Energy Safety evaluated the requested changes pursuant to the criteria set forth in Section 12 of the Revised 2023-2025 WMP Process and Evaluation Guidelines. In executing its WMP, should an electrical corporation deviate from its approved plan, it will have the opportunity to explain or justify such deviations during the compliance process.

---

<sup>1</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true>, accessed June 9, 2025).

<sup>2</sup> [Decision for Liberty 2025 Wildfire Mitigation Plan Update](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58230&shareable=true>, accessed June 9, 2025).

<sup>3</sup> [Liberty 2025 WMP Update Change Order Request](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58307&shareable=true>, accessed June 9, 2025).

<sup>4</sup> Energy Safety's Decision on Liberty's 2025 WMP Update referred Liberty to the 2023-2025 WMP Process and Evaluation Guidelines for instructions on change orders ([Decision for Liberty 2025 Wildfire Mitigation Plan Update](#), cover letter, fn. 2).

*Table 1. Determinations for Liberty Requested Changes*

<b>Liberty Initiative ID and Title</b>	<b>Change Requested</b>	<b>Determination</b>	<b>Rationale</b>
<b>Detailed Inspections of Distribution Electric Lines and Equipment (WMP-GDOM-AI-01)</b>	Liberty proposes to decrease its 2025 annual target from 260.4 <sup>5</sup> to 183.9 circuit miles.	Rejected	Liberty proposes decreasing its 2025 annual target due to optimization of its detailed asset inspection schedule. <sup>6</sup>  The proposed change does not meet the change order criteria of reducing risk. Liberty's proposed decrease of its 2025 annual target is rejected.
<b>Detailed Inspections of Distribution Electric Lines and Equipment (WMP-GDOM-AI-01)</b>	Liberty proposes to establish a new quarterly target for Q2 2025, a decrease from 65 <sup>7</sup> to 45 circuit miles.	Rejected	Liberty proposes decreasing its Q2 2025 target to align with its proposed change to its 2025 annual target, <sup>8</sup> described above.  Liberty's proposed change to its 2025 annual target does not meet the change order criteria of reducing risk. Liberty's proposed alignment and change to its Q2 2025 target is rejected.

---

<sup>5</sup> Note – Liberty's 2025 Change Order Request (Apr. 22, 2025) lists 260.4 as its approved 2025 target; however, the correct approved target is 260.9 as listed in Liberty's approved 2025 WMP Update (R1) (Sept. 3, 2024), Table 2-2 and Section 2.2.7.1.

<sup>6</sup> [Liberty 2025 WMP Update Change Order Request](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58307&shareable=true), p. 5 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58307&shareable=true, accessed June 9, 2025).

<sup>7</sup> Approved Q2 2025 target, as listed in Liberty's 2025 WMP Update (R1) (Sept. 3, 2024), Table 3-1.

<sup>8</sup> [Liberty 2025 WMP Update Change Order Request](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58307&shareable=true), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58307&shareable=true, accessed June 9, 2025).

Liberty Initiative ID and Title	Change Requested	Determination	Rationale
<b>Detailed Inspections of Distribution Electric Lines and Equipment (WMP-GDOM-AI-01)</b>	Liberty proposes to establish a new quarterly target for Q3 2025, a decrease from 195 <sup>9</sup> to 150 circuit miles.	Rejected	<p>Liberty proposes decreasing its Q3 2025 target to align with its proposed change to its 2025 annual target,<sup>10</sup> described above.</p> <p>Liberty's proposed change to its 2025 annual target does not meet the change order criteria of reducing risk. Liberty's proposed alignment and change to its Q3 2025 target is rejected.</p>

---


<sup>9</sup> Approved Q3 2025 target, as listed in Liberty's 2025 WMP Update (R1) (Sept. 3, 2024), Table 3-1.

<sup>10</sup> [Liberty 2025 WMP Update Change Order Request](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58307&shareable=true), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58307&shareable=true, accessed June 9, 2025).

**Summary**

Energy Safety rejects all of Liberty's change order requests.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole Dunlap". The signature is fluid and cursive, with the first name "Nicole" and last name "Dunlap" clearly distinguishable.

Nicole Dunlap  
Program Manager, Electrical Safety Policy Division  
Office of Energy Infrastructure Safety