



Liberty
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Docket # 2023-ARC

August 4, 2025

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Liberty's Comments on the Office of Energy Infrastructure Safety's Annual Report on Compliance for Liberty's 2023 Wildfire Mitigation Plan

Dear Mr. Doherty:

Liberty hereby provides comments on the Office of Energy Infrastructure Safety's ("Energy Safety") Annual Report on Compliance ("ARC") for Liberty's 2023 Wildfire Mitigation Plan ("WMP") released on July 21, 2025.

As Energy Safety noted, Liberty undertook significant efforts in 2023 to reduce its wildfire risk. Liberty values Energy Safety's assessment and comments on Liberty's efforts to execute and meet its objectives and initiatives for the 2023 WMP and agrees that it was successful in executing its plan for wildfire risk mitigation. Liberty appreciates the opportunity to provide comments on Energy Safety's findings.

I. Energy Safety should correct or clarify its statements regarding Liberty's unplanned outage reporting.

In the Executive Summary of the ARC, Energy Safety states: "Energy Safety observed that 95% of Liberty's reports of unplanned outages were categorized as 'unknown' without further explanation."¹ This statement lacks a timeframe of the observation and is incorrect based on Liberty's Q4 2023 Quarterly Data Report. In 2023, Liberty reported seven out of 278 unplanned outages, or less than three percent, as "unknown."² For 2022, Liberty reported 96 out of 431 unplanned outages, or approximately 22%, as "unknown." Thus, Energy Safety should clarify and provide further data or correct its statement that it observed that 95% of Liberty's reports of unplanned outages were categorized as "unknown."

¹ Energy Safety 2023 ARC, p.1.

² Liberty Q4 2023 QDR.



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Furthermore, in Section 6.1.3 of the ARC regarding outage events delineated by risk driver, Energy Safety states: "...the 'Other' category is dominated by the sub-category of unknown (>95%). Although 2023 outage events caused by the 'Other' category decreased in 2023, Energy Safety expects that in the future Liberty will determine the cause of unplanned outages, in order to allow for an analysis of the causes that lead to solutions that ultimately reduce the number of unplanned outages."³ Again, this statement is unclear about the timeframe of the observation and is incorrect, as Liberty reported less than three percent of its total unplanned outages in 2023 as "unknown" and approximately 22% of its total unplanned outages in 2022 as "unknown." Energy Safety should clarify and provide further data or correct its statement that 95% of Liberty unplanned outages categorized as "Other" are in the sub-category of "Unknown."

Closing Remark

Liberty places tremendous importance on the quality of its service and the safety of the public and its employees. As such, Liberty values Energy Safety's assessment and comments on its 2023 WMP compliance. Liberty looks forward to continuing its work with Energy Safety.

Liberty agrees that the actions it took and the outcomes achieved in 2023 clearly demonstrate successful compliance with its 2023 WMP. However, Energy Safety's evaluation should correct or clarify its statements regarding Liberty's unplanned outage reporting. Please let me know if you have any questions or require additional information.

Respectfully submitted,

Jordan Parrillo
Manager, Regulatory Affairs
Liberty

³ Energy Safety 2023 ARC, p.22.