



September 17, 2025

Dan Marsh
Senior Manager, Rates and Regulatory Affairs
Liberty Utilities
701 National Ave
Tahoe Vista, CA 96148

NOTICE OF VIOLATION

Mr. Marsh:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Liberty Utilities (LU) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a violation. Energy Safety therefore issues LU a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the office.¹

On October 9, 2024, Energy Safety conducted an inspection of LU's WMP initiatives in the vicinity of the city of Olympic Valley, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.3 - Distribution Pole Replacements, LU failed to complete work on Pole ID 60748, Grid Hardening ID 1cc492b6-ff0d-4d5f-aade-e5e6759b404c, at coordinates 39.200340, -120.233222. Energy Safety considers this completeness violation to be in the Minor risk category.

¹ Cal. Code Regs., tit. 14, section 29302(b)(2)

Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.² Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.³

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket⁴ and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation intends to request a hearing “to take public comment or present additional information,” it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.⁵ Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.Doherty@energysafety.ca.gov

Cc:

Peter Stoltman, Liberty Utilities
Peter.Stoltman@libertyutilities.com

² Energy Safety Compliance Guidelines, pp. 3

³ Energy Safety Compliance Guidelines, pp. 4-5

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV>

⁵ Energy Safety Compliance Guidelines, p. 4

Jordan Parrillo, Liberty Utilities

Jordan.Parrillo@libertyutilities.com

Samuel Isaiah, Energy Safety

Samuel.Isaiah@energysafety.ca.gov

Babak Kaviani Loginova, Energy Safety

Babak.Kaviani@energysafety.ca.gov

Yana Loginova, Energy Safety

Yana.Loginova@energysafety.ca.gov

Shannon Greene, Energy Safety

Shannon.Greene@energysafety.ca.gov

Compliance@energysafety.ca.gov



INSPECTION REPORT

Overview

Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation's wildfire risk.

A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation's execution of its WMP initiatives.

Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.⁶

Table 1. Risk Category and Correction Timelines

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 2 months (in High Fire Threat District (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	<ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update

⁶ Energy Safety Compliance Guidelines, p. 3



Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	Liberty Utilities
Report Number:	CAD_LU_CAC20_20241009_1359
Inspector:	CAC20
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.3 Distribution Pole Replacements and reinforcements
Date of inspection:	October 9, 2024
City and/or County of Inspection:	Olympic Valley, Placer County
Inspection Purpose:	Assess the accuracy of Liberty Utilities' QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

Table 3: WMP Inspection Violation(s)

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	60748	1cc492b6-ff0d-4d5f-aade-e5e6759b404c	39.200340, -120.233222	Tier 2	8.1.2.3 Distribution Pole Replacements and reinforcements	Completeness	Minor	Failed to complete work on distribution pole replacement and reinforcement.

Inspection Details

Violation 1:

Relevant Requirement:

LU's WMP states the following regarding initiative number 8.1.2.3 Distribution Pole Replacements:

1. "Liberty replaces and repairs poles to minimize the risk of system faults due to structural failure. Poles are replaced or repaired based on findings during inspections. At a minimum, inspections are conducted in accordance with G.O. 165." ⁷

Finding:

On pole ID 60748, Grid Hardening ID 1cc492b6-ff0d-4d5f-aade-e5e6759b404c, at 1700-1798 Paiute Pl, Olympic Valley, CA, 96146, 39.200340, -120.233222, the inspector observed that the distribution pole was not replaced. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GImg1, Item1GImg2, Item1IA1Img1, depict that the pole was not replaced at this location. In the 2024 Q2 Quarterly Data Report submission, LU reported that work on 8.1.2.3 – Distribution Pole Replacements and reinforcements were completed at this location.

Energy Safety concludes there is a violation because of these facts:

1. The distribution pole was not repaired or replaced.



⁷ Liberty Utilities, "LU 2023-25 Approved Wildfire Mitigation Plan," May 19, 2023, p. 159. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57295&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 60748

Violation 1

	
<p>Item1GImg1: Pole ID</p>	<p>Item1GImg2: Overall pole</p>



Item1IA1mg1: Pole not repaired or replaced.