



Liberty
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October 17, 2025

VIA OEIS E-FILING

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

Docket #2024 NOV

Subject: Liberty's Response to Notice of Violation – NOV_CAD_LU_CAC20_20241009_1359

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_CAC20_20241009_1359" (Notice of Violation or NOV), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on September 17, 2025, regarding Energy Safety's inspection of work completed by Liberty in accordance with its 2024 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 no work is required by Liberty at this time related to the Energy Safety findings identified in the above notice.

If you have any questions or require any additional information, please contact me at:

Jordan Parrillo
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Liberty Utilities (CalPeco Electric) LLC
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Liberty Response

Finding: Failure to replace distribution pole; minor severity.

Notice	Violation #	Structures
NOV_CAD_LU_CAC20_20241009_1359	Violation 1	60748

Summary of Energy Safety Findings¹:

Specifically, the NOV describes that on October 9, 2025, Energy Safety conducted an inspection of Liberty's WMP initiatives in the vicinity of Olympic Valley, California, and found the following violations:

Violation 1. 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 attached 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 that there is a violation because of these facts:

1. The distribution pole was not repaired or replaced.

Liberty Response:

There was an error in Liberty's data reporting which resulted in the misreporting of two poles as completed in Liberty's 2024 WMP Distribution Pole Replacements and Reinforcements initiative: WMP-GDOM-GH-03.²

Liberty incorrectly reported Pole ID 60748 as completed as part of its 2024 WMP Distribution Pole Replacements and Reinforcements initiative. This error occurred due to a data reporting issue that has since been resolved. Pole ID 60748 was subsequently inspected in 2024, with minor Level 3 infractions found. The repair work has been added to Liberty's work orders and will be completed within the required General Order compliance timelines. Thus, no additional work is required by Liberty at this time related to this finding.

¹ Energy Safety NOV_CAD_LU_CAC20_20241009_1359

² The two poles that Liberty is aware of that were incorrectly reported as complete as part of its 2024 WMP work are Pole ID 60748 and Pole ID 68580.