



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_CYA_20250508_1021

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_CYA_20250508_1021" (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 Liberty is not in violation and 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 Response

Finding: Failure to remove tree attachment.

Notice	Violation #	Structures
NOV_CAD_LU_CYA_20250508_1021	Violation 1	81315

Summary of Energy Safety Findings¹:

Specifically, the NOV describes that on May 8, 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 81315, Grid Hardening ID d082c49c-b01f-4e34-929a-8d171ee00dc7 at 1687-1783 Sandy Way, Olympic Valley, CA, 96146, USA, 39.2010571701618, -120.232169340005, the inspector observed that the tree attachment was present on the tree. The inspector's observation is documented in Violation 1 photographs, which are attached to this report. Photo numbers Item1IA1Img1, Item1IA1Img2 depict incomplete removal of a tree attachment. In the 2024 Q3 Quarterly Data Report submission, LU reported that work on 8.1.2.12 – Tree attachment removals were completed at this location.

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

1. A tree attachment was observed on the tree at this location.
2. The conductor is present at the tree attachment point.
3. A new pole with modern materials and specifications was not observed at this location.

¹ Energy Safety NOV_CAD_LU_CYA_20250508_1021

Liberty Response:

Liberty disagrees with Energy Safety's observation that it failed to complete the removal of a tree attachment at the pole ID 81315 location. Liberty did complete that tree attachment removal as reported in its Quarter 3 2024 WMP quarterly data report. It is possible that Energy Safety's observation was of other tree attachments in the vicinity. Additionally, Liberty replaced the removed tree attachment with a midspan connection and not a new pole. The following photo identifies the completed work at the pole ID 81315 location, showing the dead tree from which the reported tree attachment was removed.

