



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_IAG_20250506_1140

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_IAG_20250506_1140" (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_IAG_20250506_1140	Violation 1	61336

Summary of Energy Safety Findings¹:

Specifically, the NOV describes that on May 6, 2025, Energy Safety conducted an inspection of Liberty's WMP initiatives in the vicinity of Tahoe City, California, and found the following violations:

Violation 1. On pole ID 61336, Grid Hardening ID af2ba818-d441-4fb8-a98c-8c37ba465da5 at 1290-1298 Sequoia Ave, Tahoe City, CA, 96145, USA, 39.1482635800288, -120.148659119704, the inspector observed that the tree attachment was not removed from the tree. The inspector's observation is documented in Violation 1 photographs, which are attached to this report. Photo numbers Item1IA1Img1 and Item1IA1Img2 depict incomplete removal of a tree attachment. 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.
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_IAG_20250506_1140

Liberty Response:

Liberty disagrees with Energy Safety's observation that it failed to complete the removal of a tree attachment at the pole ID 61336 location as reported in its Quarter 4 2024 WMP quarterly data report. Liberty's Fulcrum application indicates that a tree attachment was removed by troubleman Del Bullard on October 29, 2024. Fulcrum also indicates that there is a second, in service, tree attachment at that pole location.

In addition to the Fulcrum recording of this tree removal, the photos below show the tree attachment no longer in use. That tree attachment was used to support a span to a nightguard that was also removed. The photos show that secondary work did occur at the pole ID 61336 location, supporting the recording made by Liberty's troubleman in Fulcrum.

Liberty's GIS system does not include all secondary tree attachments, and Liberty's fixed-wing LiDAR does not capture all secondary tree attachments as they are often below and/or behind the tree canopy, so that data does not help to supplement the documentation of the removal of this tree attachment. Beginning in Q3, 2025, Liberty now reports additional tree attachments, if applicable, where tree removals occurred as part of its GIS submissions to help both the Company and Energy Safety identify when multiple tree attachments exist.

Photo 1



Photo 2

