



Liberty
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November 19, 2025

VIA OEIS E-FILING

Sheryl Bilbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Docket #2025 NON

Subject: Liberty's Response to Notice of Non-Performance –
NON_ESD_LU_RIB_20250916_1028

Dear Sheryl Bilbrey:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the opportunity to provide this response to the finding(s) identified in the "NON_ESD_LU_RIB_20250916_1028" (Notice of Non-Performance or NON), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on October 27, 2025, regarding Energy Safety's inspection of work completed by Liberty in accordance with its 2025 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 further 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
Manager of Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
701 National Ave,
Tahoe Vista, CA 96148
Telephone: 530-721-7818
jordan.parrilo@libertyutilities.com

Liberty Response

Finding: Failure to clear or lop and scatter all slash from the lodgepole pine associated with Vegetation Management ID dd7c3473-870a-4832-b101-a88454914001; minor severity.

Notice	Deficiency #	Location
NON_ESD_LU_RIB_20250916_1028	Deficiency 1	Coordinates 38.872055, -120.001691

Summary of Energy Safety Findings¹:

Specifically, the NON describes that on September 16, 2025, Energy Safety conducted an inspection of Liberty's WMP initiatives in the vicinity of the city of South Lake Tahoe, California, and found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.3.4 Fall-In Mitigation, Liberty failed to clear or lop and scatter all slash from the lodgepole pine associated with Vegetation Management ID dd7c3473-870a-4832-b101-a88454914001 at coordinates 38.872055, -120.001691. Additionally, Energy Safety observed a cut lodgepole pine branch hanging from the branches of the surrounding trees directly above the felled log of a lodgepole pine. Energy Safety considers this non-performance to be in the Minor risk category. Liberty must complete a corrective action for this non-performance by 12 months from date of this notice.

Liberty Response:

Regarding Vegetation Management ID dd7c3473-870a-4832-b101-a88454914001, Liberty left the wood on site at the customers request, in accordance with specifications. Per the Tree Work Notification Form (TWNF) for this work, the cleanup method listed was "Chip & Haul (Firewood Lengths)." Per Liberty specifications, this means that limbs were chipped and hauled, while bole wood was cut to firewood lengths for customer use. Refer to Figure 1 below for documentation of the TWNF.

Regarding the branch hanging in a nearby tree, Liberty removed the branch on October 29, 2025. Refer to Picture 1 below for a picture of the branch hanging in the tree and to Pictures 2 and 3 below for pictures after the branch was removed.

¹ Energy Safety NON_ESD_LU_RIB_20250916_1028

Figure 1: Tree Work Notification Form
(Vegetation Management ID dd7c3473-870a-4832-b101-a88454914001)



Vegetation Management
CAtree@libertyutilities.com

Tree Work Notification Form

Liberty performs vegetation management to improve safety and reduce the risk of vegetation caused outages. A recent inspection has identified tree work on your property necessary to maintain the safety and reliability of the electrical system.

Tree work to be performed by Liberty:



Tree Removal



Facility Protect/Major Work



Contractor Assist

Species: LODGEPOLE Pine

Diameter(s) range: 14"

Total quantity: 1

Comments:

Please select one treatment option below:



Wood Removal – Liberty will haul wood and clean up the worksite. Some small debris (e.g., needles, bark, brush) may remain after wood has been hauled away.

Comments:



Leave Wood - Liberty will chip and haul limbs and brush and clean up the worksite. Wood too large to be chipped will be left on site.

Comments: FIREWOOD LENGTHS

1502 TAMOSHANTER DR

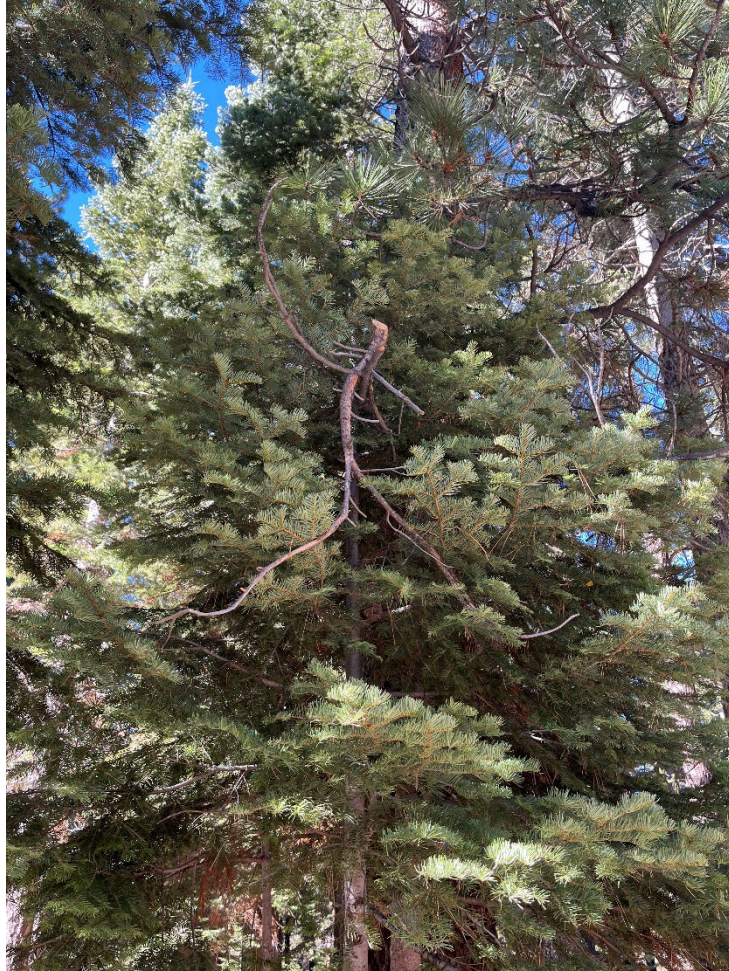
SOUTH LAKE TAHOE, CA

Property Address	City	Zip
[REDACTED]	[REDACTED]	[REDACTED]
Le [REDACTED]		Phone Number
[REDACTED]		2-28-25
Signature		Date

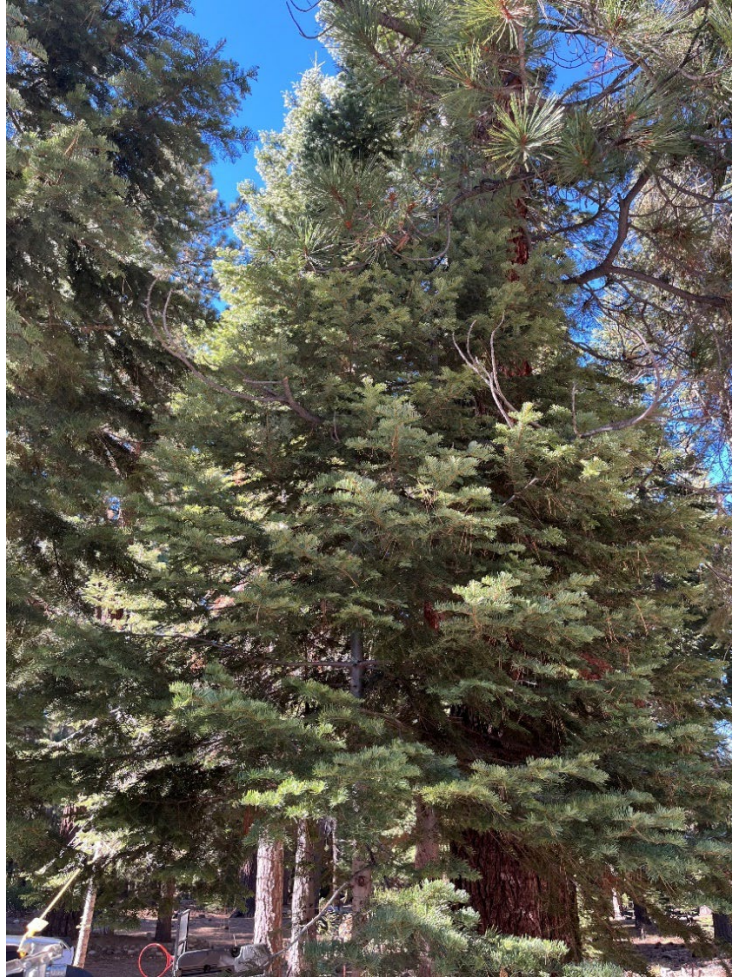
Internal Use Only

Liberty Representative, Title, and Contact Information	
DT BURNS, UTILITY FORESTER	[REDACTED]
Circuit, Section	
MEY 3200 s1	

Picture 1: Branch in nearby tree
(Vegetation Management ID dd7c3473-870a-4832-b101-a88454914001)



Picture 2: Nearby tree after branch removal
(Vegetation Management ID dd7c3473-870a-4832-b101-a88454914001)



Picture 3: Tree branch after removal
(Vegetation Management ID dd7c3473-870a-4832-b101-a88454914001)

