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May 1, 2026

Docket# 2026-SCs

Via: Electronic Submission

Tony Marino
Deputy Director, Electrical Infrastructure Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, California 95814

Re: Liberty Quarterly Notification Pursuant to Public Utilities Code Section 8389(e)(7)

Dear Deputy Director Marino,

Pursuant to Public Utilities Code Section 8389(e)(7), the April 2025 Office of Energy Infrastructure Safety's ("Energy Safety") Safety Certification Guidelines, Liberty Utilities (CalPeco Electric) LLC ("Liberty") hereby submits to the Office of Energy Infrastructure Safety ("Energy Safety") this notification detailing (1) the implementation of Liberty's 2026 Wildfire Mitigation Plan ("WMP"), (2) the implementation of the recommendations of Liberty's most recent safety culture assessment ("SCA"), (3) a statement of the recommendations of the Board of Directors Safety Committee ("Safety Committee") meetings that occurred during the quarter, and (4) a summary of the implementation of prior Safety Committee recommendations.¹

Sincerely,

A handwritten signature in black ink, appearing to read 'E-SR', is written over a horizontal line.

Eric Schwarzrock
President

¹ Items 3 and 4 are not applicable to Liberty's Q1 2026 Quarterly Notification because Liberty's Safety Committee was not established prior to Q1 2026.

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I. QUARTERLY INFORMATION-ONLY SUBMITTAL TO THE CPUC

Liberty is simultaneously submitting this quarterly notification to the California Public Utilities Commission as an information-only submittal via email to Executive Director Leuwam Tesfai at leuwam.tesfai@cpuc.ca.gov, Safety Policy Division at safetypolicycentralfiles@cpuc.ca.gov, and serving the following service lists: Order Instituting Rulemaking (R.) 21-10-001 (Order Instituting Rulemaking to Develop Safety Culture Assessments for Electric and Natural Gas Utilities), R.18-10-007 (Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901), or their successors, and the service lists for Liberty's most recent general rate case (GRC) application proceeding Application (A.) 24-09-010. Additionally, this filing will be posted to the Liberty website at: <https://california.libertyutilities.com/verdi/residential/safety/electrical/wildfire-mitigation.html>

II. QUARTERLY PROGRESS REPORT ON WMP IMPLEMENTATION

Liberty tracks quantitative targets for 21 initiatives established in its 2026-2028 Wildfire Mitigation Plan ("WMP"). Liberty's WMP initiatives are designed to mitigate the risk of wildfire due to a fault on the electric system and reduce the risk of Public Safety Power Shut-offs (PSPS) to customers. These mitigations are categorized across three categories within the WMP, which are: Grid Design, Operations and Maintenance, Vegetation Management and Inspections, and Situational Awareness and Forecasting.

1. Overview of Significant Achievements

In Quarter 1 ("Q1") of 2026 Liberty made significant progress towards achieving its WMP initiative targets for 2026. Liberty's achievements in Q1 of 2026 are below. This information was also submitted to Energy Safety as part of its Quarterly Data Report ("QDR") filing for Q1 2026 in accordance with Energy Safety guidelines.

- **Covered conductor installation (WMP-GDOM-GH-01):** 2026 WMP target is 3.9 circuit miles. Per Liberty's comments on the Energy Safety draft decision on its 2026-2028 Base WMP, Liberty has increased its covered conductor installation commitment to 7.0 miles.² As of the end of Q1 2026, Liberty has completed 0.18 circuit miles of covered conductor installation.
- **Pole replacements and reinforcements (WMP-GDOM-GH-03):** 2026 WMP target is 400 poles. As of the end of Q1 2026, Liberty has completed 80 pole replacements.
- **Traditional overhead hardening (WMP_GDOM-GH-05):** 2026 WMP target is 1.1 circuit miles. As of the end of Q1 2026, Liberty has completed 0 miles of traditional overhead hardening. Per Liberty's comments on the Energy Safety draft decision on its 2026-2028 Base WMP, Liberty has replaced its 2026 traditional overhead hardening target of 1.1 miles with covered conductor installation.

² Opening Comments of Liberty Utilities (CalPeco Electric) LLC (U 933-E) on Office of Energy Infrastructure Safety Draft Decision on Liberty 2026–2028 Base WMP, March 9, 2026.

- **Tree attachment removals (WMP-GDOM-GH-12a):** 2026 WMP target is 60 tree attachments. As of the end of Q1 2026, Liberty has completed 46 tree attachment removals.
- **Expulsion fuse replacement (WMP-GDOM-GH-12b):** 2026 WMP target is 500 expulsion fuses. Per Liberty’s comments on the Energy Safety draft decision on its 2026-2028 Base WMP, Liberty has increased its expulsion fuse replacement commitment to 1000 expulsion fuses.³ As of the end of Q1 2026, Liberty has completed 476 expulsion fuse replacements.
- **Open wire/grey wire (WMP-GDOM-GH-12e):** 2026 WMP target is 5.2 circuit miles. As of the end of Q1 2026, Liberty has completed 6.02 miles of open wire/grey wire.
- **Detailed asset inspections (WMP-GDOM-AI-01):** 2026 WMP target is 207 circuit miles. As of the end of Q1 2026, Liberty has completed 103.94 miles of detailed asset inspections.
- **Intrusive pole inspections (WMP-GDOM-AI-02):** 2026 WMP target is 2,031 poles. As of the end of Q1 2026, Liberty has completed 0 intrusive pole inspections. Liberty typically begins its intrusive pole inspections in Q3.
- **Patrol asset inspections (WMP-GDOM-AI-03):** 2026 WMP target is 553.4 circuit miles. As of the end of Q1 2026, Liberty has completed 553.4 miles of patrol asset inspections.
- **Other discretionary asset inspections: drone inspections (WMP-GDOM-AI-04):** 2026 WMP target is 127 circuit miles. As of the end of Q1 2026, Liberty has completed 0 miles of other discretionary asset inspections. Liberty plans to begin its other discretionary asset inspections in Q2 2026.
- **Quality assurance/quality control of asset inspections (WMP-GDOM-AI-05):** 2026 WMP target is 12% of detailed asset inspections. As of the end of Q1 2026, Liberty has completed 0% of its QA/QC asset inspections. Liberty typically completes its QA/QC asset inspections in Q4.
- **Substation inspections (WMP-GDOM-AI-06):** 2026 WMP target is 44 substations. As of the end of Q1 2026, Liberty has completed 14 substation inspections.
- **Detailed vegetation management inspections (WMP-VM-INSP-01):** 2026 WMP target is 233 circuit miles. As of the end of Q1 2026, Liberty has completed 85.15 miles of detailed vegetation management inspections.
- **LiDAR vegetation management inspections (WMP-VM-INSP-03)** 2026 WMP target is 700 circuit miles. As of the end of Q1 2026, Liberty has completed 0 miles of LiDAR vegetation management inspections. Liberty typically completes its LiDAR vegetation management inspections in Q3.
- **Pole clearing – required (WMP-VM-VFM-01-R):** 2026 WMP target is 4,500 poles. As of the end of Q1 2026, Liberty has completed 0 poles. Pole clearing work is scheduled to begin in May.
- **Pole clearing – discretionary (WMP-VM-VFM-01-D):** 2026 WMP target is 400 poles. As of the end of Q1 2026, Liberty has completed 0 poles. Pole clearing work is scheduled to begin in May.

³ Opening Comments of Liberty Utilities (CalPeco Electric) LLC (U 933-E) on Office of Energy Infrastructure Safety Draft Decision on Liberty 2026–2028 Base WMP, March 9, 2026.

- **Wood and slash management (WMP-VM-VFM-02):** 2026 WMP target is 280 acres. As of the end of Q1 2026, Liberty has completed 8.81 acres of wood and slash management.
- **Substation defensible space (WMP-VM-VFM-03):** 2026 WMP target is 12 substation inspections. As of the end of Q1 2026, Liberty has completed 0 substation inspections as part of its substation defensible space initiative. Liberty plans to begin its substation defensible space inspections in June.
- **Clearance (WMP-VM-VFM-05):** 2026 WMP target is 700 circuit miles. As of the end of Q1 2026, Liberty has completed 400.98 miles of clearance.
- **Fall-in mitigation (WMP-VM-VFM-06):** 2026 WMP target is 220 circuit miles. As of the end of Q1 2026, Liberty has completed 0 miles of fall-in mitigation work. Liberty will begin fall-in mitigation work in Q2. Fall-in mitigation work is sequenced to follow clearance activities in order to prioritize clearance completion ahead of the fire season and to support operational efficiency. Additionally, winter conditions experienced across Liberty’s service territory during Q1 create challenges to safely and efficiently complete tree removal activities. As clearance work is completed and conditions improve, Liberty will progressively reallocate resources to fall-in mitigation beginning in Q2 to support achievement of the annual target.
- **Vegetation management quality assurance and quality control (WMP-VM-QAQC-01):** 2026 WMP target is 228 circuit miles. As of the end of Q1 2026, Liberty has completed 103.77 miles of vegetation management QA/QC work.

2. Overview of Delays or Problems that Arose

Liberty is on track to meet all of its WMP initiatives with quantitative targets except for one WMP initiative: Traditional overhead hardening (WMP_GDOM-GH-05). The reason for this is because Liberty replaced the 2026 work previously planned as traditional overhead hardening with covered conductor installation. The 1.1 mile target for traditional overhead hardening is now included in Liberty’s increased covered conductor installation commitment of 7.0 miles. The shift from traditional overhead hardening to covered conductor installation for the 1.1 miles target better aligns with Liberty’s recalibrated wildfire-only risk outputs required by Energy Safety’s Revision Notice on Liberty’s 2026-2028 Base WMP.⁴

III. QUARTERLY PROGRESS REPORT ON IMPLEMENTING SAFETY CULTURE RECOMMENDATIONS

On December 19, 2025, Energy Safety issued a Safety Culture Assessment (“2024 SCA”) report to Liberty. In a March 30, 2026 letter to Energy Safety, Liberty agreed to implement all of the recommendations in the 2024 SCA and listed the actions to implement the recommendations. It is the most recent completed Safety Culture Assessment for Liberty. The recommendations and actions are as follows:

⁴ The Office of Energy Infrastructure Safety Issuance of Revision Notice on the Liberty Utilities (CalPeco Electric), LLC 2026-2028 Base Wildfire Mitigation Plan, October 21, 2025.

1. **Continue to increase organizational learning by encouraging safety reporting and feedback and continue to improve leadership engagement to increase perceptions of support and commitment from leadership and create a work environment that is conducive for learning.**

In response to this recommendation, Liberty:

- Begun emphasizing and demonstrating more thorough safety observations in the field at a regular cadence.
- Made a change in leadership, including appointment of a new Senior Manager of Operations to increase leadership engagement and communication.
- Continued monthly safety culture meetings to review performance, significant event learning, Safety alerts including near misses, quality safety observation reviews, quality job brief reviews, upcoming trainings, and improvements that can be made to safety culture to ensure alignment amongst leadership and field employees. To further improve communication and engagement, Liberty added field employees to the safety culture meetings.
 - In 2026, Liberty has continued regular safety culture meetings and they are scheduled out monthly for the remainder of the year. Participants include site leadership, Environmental Health and Safety (“EHS”) members, and field employees, including operations, vegetation management, and warehouse employees.
- Plans to continue safety culture training to all supervisor and above positions.
 - Liberty Radiant Leader EHS leadership training scheduled for Q2.
 - Additional training for leadership, field employees and contractors scheduled in 2026. Liberty is currently sourcing an outside vendor, Echelon Front, to be included.
 - Continued monthly safety trainings with field employees attended by leadership to enforce and influence safety culture.
- Plans to reinforce top-tier job briefs, critical lift triggers, and communication expectations.
 - Sample Job Briefs reviewed at the safety culture meeting.
 - Job Brief training scheduled for 2026.
 - Rigging/Hoisting/Critical Lift Training scheduled for 2026.
- Increased field engagements and close-the-loop communication after hazards or near misses.
 - Liberty has traditionally reported on good catches, near misses, and safety incidents. Liberty utilizes Gensuite action tracker to document corrective actions and to see through that actions are accomplished.
 - By bringing field personnel into Liberty’s safety culture meetings, Liberty is increasing field engagement and emphasizing close-the-loop communications.

- 2. Continue developing a cross-functional culture committee comprised of individual contributors and managers to gather insights and take action to improve overall safety culture.**

Beginning in April, Liberty has expanded its safety culture members to include field employees. Liberty is also now including field employees to improve the culture from the inside-out. The intent of adding field employees is to review and make continued safety culture improvement together.

- 3. Increase engagement with contractors to address continued low workforce survey participation from its contractor workforce and refine its safety culture objectives to target ways to improve contractor relationships and solicit feedback from them.**

In response to this recommendation, Liberty:

- Plans to establish the Contractor Academy to standardize expectations, training, contractor onboarding and supervision.
- Included contractors at every safety stand down meeting held in Q1 2026, as Liberty did throughout 2025. Liberty has a joint safety standdown planned for June 2026 that will include reviewing industry incidents, wildfire prevention training, rubber goods training, and heat and illness training.
- Additional training scheduled in 2026 will include leadership, field employees and contractors. Liberty is currently sourcing an outside vendor, Echelon Front, to be included.

IV. BOARD OF DIRECTORS SAFETY AND OPERATIONS COMMITTEE RECOMMENDATIONS

Liberty established a formal charter for its Safety and Operations Committee (“Safety Committee”). The charter was approved by the Board on April 23, 2026. The committee is responsible for:

- reviewing Liberty’s safety culture, goals, and risks;
- reviewing safety related incidents, measures and strategies to prevent;
- monitoring current and emerging safety matters;
- providing strategic guidance and recommendations to the Board and Liberty; and
- briefing the California Public Utilities Commission (“CPUC”) and Energy Safety on safety issues and performance.

1. Recommendations from the most recent quarter

Not applicable for Q1 2026. Liberty’s Safety Committee was not established and did not meet in 2025.

2. Progress on previous recommendations

Not applicable for Q2 2026. Liberty's Safety Committee was not established prior to Q1 2026.

Sincerely,

A handwritten signature in black ink, appearing to read "E-SR", written in a cursive style.

Eric Schwarzrock
President