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November 16, 2026

Docket# 2026-SCs

Via: Electronic Submission

Director Forest Michael Kaser
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, California 95814

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

Dear Director Kaser,

Pursuant to Public Utilities Code Section 8389(a)(7), the September 2026 Office of Energy Infrastructure Safety's ("Energy Safety") Safety Certificate Guidelines Version 2.0, Liberty Utilities (CalPeco Electric) LLC ("Liberty") hereby submits to Energy Safety this notification detailing Liberty's progress on its (1) approved Wildfire Mitigation Plan ("WMP"), (2) recommendations from its most recent Safety Culture Assessment ("SCA"), (3) a statement of the recommendations of the Board of Directors Safety Committee (Safety Committee) meetings and (4) a description of the implementation of the Safety Committee recommendations.

I. Background

Governor Newsom signed Assembly Bill (AB) 1054 into law on July 12, 2019. AB 1054 contains numerous statutory provisions and amendments designed to enhance the mitigation and prevention of utility-related catastrophic wildfires in California and promote utility financial stability, including the creation of the safety certification process. Public Utilities Code Section 8389(e) established the requirements for the electrical corporations to receive an annual safety certification,[1] which, among other things, include an approved WMP and implementation of the initiatives therein, the establishment of a safety committee of the electrical corporation's board of directors, board-of-director-level reporting to the Commission on electrical system safety, and the submission of quarterly reports notifying Energy Safety and the Commission regarding WMP implementation and compliance with other AB 1054 requirements.

Specifically, Public Utilities Code section 8389(a)(7) requires the electrical corporation to submit a notification of implementation to Energy Safety on a quarterly basis detailing progress on its WMP, the recommendations of its most recent Energy Safety and CPUC SCAs performed pursuant to Public Utilities Code section 8386(d)(4) and section 8386.2, and a statement of the recommendations of the board of directors safety committee meetings and a description of the

[1] Senate Bill 254, signed into law and effective on September 19, 2025, amended the term from "safety certification" to "certificate."

implementation of those recommendations. Liberty's Quarterly Notification for the third quarter of 2026 is contained herein.

II. Discussion

1. Quarterly Information-Only Submittal to the CPUC

Liberty submits this quarterly notification to the California Public Utilities Commission ("CPUC") 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 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.

2. Quarterly Progress Report on WMP Implementation

Liberty tracks quantitative targets for 21 initiatives established in its 2026-2028 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") for its 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.

2.1 Overview of Significant Achievements

In Quarter 3 ("Q3") of 2026, Liberty met or made significant progress towards meeting its WMP initiative targets for 2026. Liberty's achievements through Q3 of 2026 are below. This information was also submitted to Energy Safety as part of its Quarterly Data Report ("QDR") filing for Q3 2026 in accordance with Energy Safety guidelines.[2]

- **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 WMP, Liberty increased its covered conductor installation commitment to 7.0 miles.[3] As of the end of Q3 2026, Liberty has completed 6.3 circuit miles of covered conductor installation. Target Attainment: 90%
- **Pole replacements and reinforcements (WMP-GDOM-GH-03)**: 2026 WMP target is 400 pole. As of the end of Q3 2026, Liberty has completed 562 pole replacements. Target Attainment: 141%.
- **Traditional overhead hardening (WMP_GDOM-GH-05)**: 2026 WMP target was

[2] Liberty's Q3 QDR is available on Energy Safety's Docket #2026 Data Submissions: https://efiling.energysafety.ca.gov/Search.aspx?docket=2026%20Data%20Submissions

[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.

1.1 circuit miles. Per Liberty's comments on the Energy Safety draft decision on its 2026-2028 WMP, 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.

- **Tree attachment removals (WMP-GDOM-GH-12a)**: 2026 WMP target is 60 tree attachments. As of the end of Q3 2026, Liberty has completed 88 tree attachment removals. Target Attainment: 147%.
- **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 1,000 expulsion fuses.[4] As of the end of Q3 2026, Liberty has completed 981 expulsion fuse replacements.[5] Target Attainment: 98%
- **Open wire/grey wire (WMP-GDOM-GH-12e)**: 2026 WMP target is 5.2 circuit miles. As of the end of Q3 2026, Liberty has completed 8.9 miles of open wire/grey wire. Target Attainment: 171%.
- **Detailed asset inspections (WMP-GDOM-AI-01)**: 2026 WMP target is 207 circuit miles. As of the end of Q3 2026, Liberty has completed 203.69 miles of detailed asset inspections. Target Attainment: 98%.
- **Intrusive pole inspections (WMP-GDOM-AI-02)**: 2026 WMP target is 2,031 poles. As of the end of Q3 2026, Liberty has completed 1,555 intrusive pole inspections. Target Attainment: 77%.
- **Patrol asset inspections (WMP-GDOM-AI-03)**: 2026 WMP target is 553.4 circuit miles. As of the end of Q3 2026, Liberty has completed 553.4 miles of patrol asset inspections. Target Attainment: 100%
- **Other discretionary asset inspections: drone inspections (WMP-GDOM-AI-04)**: 2026 WMP target is 127 circuit miles. As of the end of Q3 2026, Liberty has completed 127 miles of other discretionary asset drone inspections. Target attainment: 100%.
- **Quality assurance/quality control ("QA/QC") of asset inspections (WMP-GDOM-AI-05)**: 2026 WMP target is 12% of detailed asset inspections. As of the end of Q3 2026, Liberty has completed 2.4% of its QA/QC asset inspections. Liberty typically completes its QA/QC asset inspections in Q4. Target attainment: 20%.
- **Substation inspections (WMP-GDOM-AI-06)**: 2026 WMP target is 44 substations. As of the end of Q3 2026, Liberty has completed 39 substation inspections. Target attainment: 89%.
- **Detailed vegetation management inspections (WMP-VM-INSP-01)**: 2026 WMP target is 233 circuit miles. As of the end of Q3 2026, Liberty has completed 178.48 miles of detailed vegetation management inspections. Target Attainment: 77%.
- **LiDAR vegetation management inspections (WMP-VM-INSP-03)** 2026 WMP target is 700 circuit miles. As of the end of Q3 2026, Liberty has completed 700 miles of LiDAR vegetation management inspections. Target Attainment: 100%.

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[4] *Id.*

[5] On September 16, 2026, Liberty submitted revisions to Energy Safety for its Q1 and Q2 QDR data for the fuse replacement initiative. Liberty removed new fuse installations that were previously reported as replacements in its QDR data.

- **Pole clearing – required (WMP-VM-VFM-01-R)**: 2026 WMP target is 4,500 poles. As of the end of Q3 2026, Liberty has completed 4,872 poles. Target Attainment: 108%.
- **Pole clearing – discretionary (WMP-VM-VFM-01-D)**: 2026 WMP target is 400 poles. As of the end of Q3 2026, Liberty has completed 422 poles. Target Attainment: 106%.
- **Wood and slash management (WMP-VM-VFM-02)**: 2026 WMP target is 280 acres. As of the end of Q3 2026, Liberty has completed 174.42 acres of wood and slash management. Target Attainment: 62%.
- **Substation defensible space (WMP-VM-VFM-03)**: 2026 WMP target is 12 substation inspections. As of the end of Q3 2026, Liberty has completed 12 inspections of substation defensible space. Target Attainment: 100%.
- **Clearance (WMP-VM-VFM-05)**: 2026 WMP target is 700 circuit miles. As of the end of Q3 2026, Liberty has completed 700 miles of clearance. Target Attainment: 100%.
- **Fall-in mitigation (WMP-VM-VFM-06)**: 2026 WMP target is 220 circuit miles. As of the end of Q3 2026, Liberty has completed 273.62 miles of fall-in mitigation work. Target Attainment: 124%.
- **Vegetation management quality assurance and quality control (WMP-VM-QAQC-01)**: 2026 WMP target is 228 circuit miles. As of the end of Q3 2026, Liberty has completed 232.9 miles of vegetation management for QA/QC work. Target Attainment: 102%.

2.2 Overview of Delays

Liberty has met, exceeded or is on track to meet all of its WMP initiatives with quantitative targets. Liberty upgraded the 2026 work previously planned as traditional overhead hardening (WMP_GDOM-GH-05) with covered conductor installation to reduce additional risk. 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.[6]

3. Quarterly Progress Report on Implementing SCA 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. To date, Liberty has not conducted a CPUC SCA. The recommendations and actions from the Energy Safety 2024 SCA are as follows:

[6] 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.

Table 1: Implementation of SCA Recommendations

SCA	Recommendation	Goal	Actions Taken
Energy Safety 2024	Liberty should continue to increase organizational learning by encouraging safety reporting and feedback. Liberty should also continue to improve leadership engagement to increase perceptions of support and commitment from leadership and create a work environment that is conducive for learning. Liberty should continue to build this capacity as a learning organization to ensure employees feel comfortable reporting hazards and feedback and have adequate engagement with leadership in order to feel heard.	The goal of this recommendation is to enhance a sense of trust, respect, and cooperation between and amongst employees and leadership. This recommendation should also increase perceptions of support and commitment from leadership, which will enhance organizational learning.	In response to this recommendation, Liberty: • Provided Radiant Leadership training to Operations leaders on June 2, 2026. The Lead by Safety training covered effective communication methods, management styles, and accountability. One of the objectives of the meeting is to remind leaders how to foster a culture of support and trust, and to create an environment where the team members are empowered to learn and develop professionally. This leadership development was further reinforced on September 15, 2026, through High-Quality Safety Observation ("HQSO") training, strengthening the group's focus on proactive safety engagement and effective field observations. This training further equipped the group to engage employees in meaningful safety conversations, reinforce safe behaviors and work practices, and strengthen safety at the point of work. HQSOs provide an important mechanism for strengthening proactive safety engagement and continuous improvement. The approach encourages leaders and employees to move beyond simply identifying safe or at-risk behaviors and instead engage in meaningful conversations about how work is actually performed, including the hazards and energy exposures present, the effectiveness of critical controls, and opportunities to improve the work. These observations reinforce positive practices, encourage all-worker participation and shared learning, and can help identify emerging risks before they contribute to an event. When aligned with Liberty's STKY Energy-Based Zero Harm approach, High-Quality Safety Observations further strengthen the employee and contractor collaboration and focus on recognizing and effectively controlling the energy exposures with the greatest potential for serious injury or fatality (SIF). • Liberty advertised and posted a safety concern intake form around the facilities with a QR code so employees can report safety concerns to the Joint Health and Safety Committee ("JHSC"). The submissions are automatically recorded in the committee's SharePoint site, reviewed, and tracked via an action log. Since implementation , several submissions continue to be received through the QR code. The JHSC continues to review, discuss solutions, and assign corrective actions to the appropriate owners. The intent is to be action-oriented, to address the concerns, and to further demonstrate Liberty's commitment to addressing safety concerns and opportunities. Complementing the active involvement of the JHSC, Liberty backfilled its EHS Specialist position serving its two Tahoe area service locations with a boots-on-the-ground safety professional who brings direct line experience. This field-based experience enhances the organization's ability to provide practical safety support, engage effectively with crews, identify and address operational risks, and reinforce the application of safety expectations where work is performed. • To further promote proactive and continuous safety improvement, Liberty also refreshed its Good Catch reporting program and introduced a rewards and recognition component

SCA	Recommendation	Goal	Actions Taken
			designed to encourage employee engagement, reporting, and action-oriented sharing and learning. These efforts reinforce Liberty's commitment to providing accessible avenues for employees to raise concerns, proactively identify opportunities for improvement, share lessons learned, and drive concerns through to appropriate action and resolution. • Partnered with outside vendor Echelon Front and provided Extreme Ownership training to operational leaders, frontline employees, and Liberty's line contractor in June to further encourage and support learning and development. Liberty continued to strengthen its proactive approach to employee health and safety training on September 1 and 2, 2026 with "WorkReady365" - a partnership with Vimocity. Crews and leaders received training and Movement Kits to support practical application in the field, and line crews are now performing the Daily5 at the start of each workday. The process reinforces readiness across three key dimensions: mental readiness, physical movement, and job-specific readiness. By embedding these practices into the daily routine, Liberty is reinforcing a culture in which work readiness and injury prevention begin before the task starts. Increased training opportunities available for leadership, field employees, and contractors. These will be scheduled for the last quarter of 2026. This includes "Hold the Pull" – Industry Event Sharing of Trends and Lessons Learned in collaboration with the IBEW1245 Safety Initiative, and Mental Health in the Trades Training. Continued monthly safety training with field employees, led and attended by leadership to promote a better safety culture.
Energy Safety 2024	Liberty should continue developing a cross-functional culture committee comprised of individual contributors and managers to gather insights and take action to improve overall safety culture. Liberty should broaden the scope of the established safety committee to specifically address employee perception of overall culture and the extent to which it builds into safety culture.	The goals of this recommendation are to build upon existing efforts to gather insights on safety culture, and further develop a positive, inclusive, and collaborative approach to improve safety practices and overall culture.	In response to this recommendation: • In April, Liberty expanded its safety culture members to include field employees. In May, Liberty established a charter and renamed the committee to the Joint Health and Safety Committee. The JHSC provides a formal, collaborative forum for employees and management to identify safety concerns, review trends, discuss practical solutions, assign corrective actions, and track issues to closure. The JHSC is intended to support Liberty's safety culture by ensuring that employee safety concerns are heard, documented, acted upon, and communicated back to the workforce. The JHSC further supports Liberty's safety culture improvement efforts by serving as a cross-functional forum for employees and managers to discuss safety culture issues and implement improvement actions. The JHSC includes equal representation from management and employees and includes ten members. The committee will be discussing expansion next month. Based on the early success of the committee, Liberty has expanded to include two more members, including the warehouse supervisor and the fleet and facilities coordinator. Meeting minutes and an action log are tracked through a SharePoint site. The JHSC meets monthly, or more frequently as necessary.
Energy Safety 2024	Liberty should increase engagement with contractors to improve	Liberty should increase engagement with contractors to	In response to this recommendation: • Liberty plans to establish the Contractor Academy to standardize expectations, training, contractor onboarding, and supervision. The development of this new program is in

SCA	Recommendation	Goal	Actions Taken
	contractor workforce survey participation. Liberty should refine its safety culture objectives to target ways to improve contractor engagement and actively gather feedback from its contractor workforce.	improve contractor workforce survey participation. Liberty should refine its safety culture objectives to target ways to improve contractor engagement and actively gather feedback from its contractor workforce.	progress. • Liberty's primary operations contractor attended safety stand-downs in Q2 and will again in Q4 of 2026, along with Liberty's employees. The joint safety stand-down conducted in Q2 included reviewing industry incidents, the Fire Prevention Plan, rubber-goods training, and the Cal OSHA wildfire smoke standard training. Over 80 attendees were present at this event, including 33 contractors and 53 Liberty employees. On July 8, 2026, Liberty conducted Fire Prevention Plan training with its primary vegetation management contractors who conduct vegetation inspections, tree pruning, and hazard tree removal activities. The Fire Prevention Plan training helps crews learn how to evaluate weather and field conditions before work begins to adjust work practices, tools, and equipment based on Liberty's established fire potential index thresholds. Including contractors in this training reinforces wildfire prevention expectations, promotes consistent operational practices, strengthens communication between Liberty and its contractors, and provides additional opportunities for contractor engagement and feedback on fire prevention requirements. At the Q4 safety stand-down, Liberty will incorporate interactive Fire Safety and STKY ("Stuff That Can Kill You") Energy-Based Zero Harm Safety trivia, supported by a raffle to encourage contractor participation and engagement. The activity will reinforce key fire safety concepts and the STKY energy-based approach to recognizing hazardous energy, strengthening awareness of the exposures that have the potential to result in serious injuries or fatalities. The interactive format is intended to promote shared learning, proactive hazard recognition, and application of effective controls while reinforcing Liberty's continued commitment to Zero Harm. • To strengthen engagement with its contractor workforce, Liberty provides contractors with access to applications, situational awareness tools, and processes used by its employees. This approach promotes consistency across the workforce, supports collaboration and communication, reporting of incidents and good catches, sharing of lessons learned, and provides opportunities for contractors to share feedback on Liberty's safety programs, operational practices, and continuous improvement initiatives. For example, Liberty's operations contractors receive training on the use of Liberty's Tailboard Briefing Checklist Application, which is utilized to conduct a job safety assessment and hazard analysis and application of safety controls/safeguards prior to the commencement of work. The application incorporates location-specific information and sign-off by all workers to enhance field situational awareness, including the current Fire Potential Index ("FPI") applicable to the work location and any operational considerations or work restrictions identified in Liberty's Fire Prevention Plan. Liberty plans to establish the Contractor Academy to standardize expectations, training, contractor onboarding and supervision. The development of this new program is in progress.

4. Board of Directors Safety 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 CPUC and Energy Safety on safety issues and performance.

4.1 Recommendations from the Most Recent Quarter

The Safety Committee held a meeting on July 23, 2026. At its July 23, 2026 meeting, the Safety Committee discussed wildfire mitigation planning, grid safety matters, safety culture and governance, and public power shutoff preparedness, among other things. No recommendations were made at this meeting.

4.2 Progress on Previous Recommendations

Not applicable for Q3 2026. Liberty's board-level Safety Committee has not made any recommendations.

Table 2: Board of Directors Safety Committee Recommendations

Safety Committee Meeting	QN Date	Recommendation	Status	Actions Taken
April 23, 2026	July 31, 2026	There were no Safety Committee recommendations during Q2 2026 to report.	NA	NA
July 23, 2026	November 1, 2026	There were no Safety Committee recommendations during Q3 2026 to report.	NA	NA

Sincerely,



Eric Schwarzrock
President