

Docket	:	<u>A.25-06-017</u>
Exhibit Number	:	<u>CA-17</u>
Commissioner	:	<u>M. Baker</u>
Admin Law Judge	:	<u>R. Haga</u>
Witness	:	<u>                    </u>



**PUBLIC ADVOCATES OFFICE  
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**CROSS EXHIBIT**

**LIBERTY'S RESPONSE TO DATA REQUEST  
CALADVOCATES-LIB-A2506017-024,  
OCTOBER 24, 2025**

San Francisco, California  
February 9, 2026



Liberty Utilities (CalPeco Electric) LLC  
933 Eloise Avenue  
South Lake Tahoe, CA 96150  
Tel: 800-782-2506  
Fax: 530-544-4811

October 24, 2025

**Liberty Utilities (CalPeco Electric) LLC**

**A.25-06-017  
WEMA**

**The Public Advocates Office**

Data Request No.: CalAdvocates-LIB-A2506017-024  
Requesting Party: Public Advocates Office  
Originator: Amanda Asadi, Amanda.Asadi@cpuc.ca.gov  
Aaron Louie, Aaron.Louie@cpuc.ca.gov  
Patrick Huber, Patrick.Huber@cpuc.ca.gov  
cc: Matthew Karle, Matthew.Karle@cpuc.ca.gov  
Cal Advocates Wildfire Discovery  
CalAdvocates.WildfireDiscovery@cpuc.ca.gov  
Date Received: October 10, 2025  
Due Date: October 24, 2025

---

**SED's audits**

The following questions pertain to SED's audits of Liberty's facilities and records. In each instance, SED identified one or more violations of CPUC's General Orders. Liberty was directed to advise SED of all corrective measures Liberty subsequently took to remedy and prevent such violations.

**REQUEST NO. 1:**

From June 4, 2012 to June 7, 2012, SED audited Liberty's facilities.<sup>1</sup>

- a) Provide Liberty's written response to the audit.

---

<sup>1</sup> [https://www.cpsc.ca.gov/-/media/cpsc-website/files/uploadedfiles/cpsc\\_public\\_website/content/safety/electric\\_safety\\_and\\_reliability/reports\\_and\\_audits/electric\\_facilities/ea2012-013.pdf](https://www.cpsc.ca.gov/-/media/cpsc-website/files/uploadedfiles/cpsc_public_website/content/safety/electric_safety_and_reliability/reports_and_audits/electric_facilities/ea2012-013.pdf)

- b) Provide the actions that Liberty took in response to remedy and prevent such violations.

**RESPONSE:**

- a) Please refer to attachment *2012 GO 165 CPUC Audit Report-NLT.pdf*
- b) See Liberty's response to subpart (a).

**REQUEST NO. 2:**

From July 19, 2016 to July 21, 2016, SED audited Liberty's Substation facilities.<sup>2</sup>

- a) Provide Liberty's written response to the audit.
- b) Provide the actions that Liberty took in response to remedy and prevent such violations.

**RESPONSE:**

- a) Liberty is continuing to search its records for this response and will provide an update in a supplemental response.
- b) See Liberty's response to subpart (a).

**REQUEST NO. 3:**

From July 24, 2017 to July 28, 2017, SED audited Liberty's South Lake Tahoe distribution facilities.<sup>3</sup>

- a) Provide Liberty's written response to the audit.
- b) Provide the actions that Liberty took in response to remedy and prevent such violations.

**RESPONSE:**

- a) Liberty is continuing to search its records for this response and will provide an update in a supplemental response.
- b) See Liberty's response to subpart (a).

---

<sup>2</sup> [https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc\\_public\\_website/content/safety/electric\\_safety\\_and\\_reliability/reports\\_and\\_audits/electric\\_facilities/sa2016-005.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/safety/electric_safety_and_reliability/reports_and_audits/electric_facilities/sa2016-005.pdf)

<sup>3</sup> [https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc\\_public\\_website/content/safety/electric\\_safety\\_and\\_reliability/reports\\_and\\_audits/electric\\_facilities/ea2017-757.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/safety/electric_safety_and_reliability/reports_and_audits/electric_facilities/ea2017-757.pdf)