

Docket	:	<u>A.25-06-017</u>
Exhibit Number	:	<u>CA-18</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 UTILITIES (CALPECO ELECTRIC) LLC
RESPONSE TO SOUTH LAKE TAHOE AUDIT REPORT
(EA2017-757)**

San Francisco, California
February 9, 2026

Liberty Utilities (CalPeco Electric) LLC
Response to South Lake Tahoe Audit Report (EA2017-757)

Records Violations – Corrective Actions Taken or Planned

1. GO 165, Section III-B, Standards for Inspection

- ESRB observed that LU does not perform routine diagnostic testing on its switches, voltage regulators, reclosers and capacitor banks. In addition, LU does not have any written procedures in place for detailed inspections for the equipment mentioned above.

Response:

- *Liberty will develop and document diagnostic tests for the equipment listed in the violation.*

2. GO 95, Rule 31.1, Design, Construction and Maintenance

- ESRB staff reviewed work orders and noted that LU did not complete several work orders by their assigned due dates.

Response:

- *Liberty was unable to complete these work orders within the required time frame due to severe winter conditions. LU will hold an internal review of procedures around G095/165 work orders to ensure they are completed on time.*

Field Inspection Violations – Corrective Actions Taken or Planned

1. GO 95, Rule 31.1, Construction and Maintenance

- LU left idle hardware (staple) at pole #264125 located at 650 Eastside Lane, Coleville.
A Crew member removed the staple with a claw hammer.

Date Completed Corrective Actions: 10/02/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

- LU has two underarm straps loose on the secondary bus at pole #92757 located at 115430 Highway 395, Topaz.
A Crew member re-nailed the two straps.

Date Completed Corrective Actions: 10/02/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

2. GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking

- LU Pole #50865 did not have high voltage signs, located at 2820 South Upper Truckee Road, South Lake Tahoe.
High voltage signs were installed by the Crew.

Date Completed Corrective Actions: 10/03/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

3. GO 95, Rule 54.6-B, Vertical and Lateral Conductors and Ground Wires

LU had exposed ground wire on the following poles:

- Pole #66597 located at 1037 Marjorie Street, South Lake Tahoe
A Crew member installed wood molding to protect ground wire.
- Pole #163878 located at 235 Crystal Springs Road, Markleeville
A Crew member installed wood molding to protect ground wire.
- Pole #92757 located at 115430 Highway 395, Topaz
A Crew member installed wood molding to protect ground wire.

Date Completed Corrective Actions: 10/03/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

4. GO 95, Rule 54.6-I, Attachment of Protective Coverings

- LU has a loose riser strap on a riser guard approximately 15 feet high at pole #91499 located across from 401 Crystal Springs Road, Markleeville.
A Crew member nailed the riser strap back into the pole.
- LU has a loose riser strap on a riser guard approximately 20 feet high at pole #186209 located across from 120 Crystal Springs Road, Markleeville.
A Crew member nailed the riser strap back into the pole.

Date Completed Corrective Actions: 10/04/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

5. GO 95, Rule 56.4-C4, Clearances from Conductors Passing on Same Poles

- LU had a service drop with less than 3 inches of radial clearance from an anchor at 314 Crystal Springs Road, Markleeville.
The Crew moved the entire service to the other side of the pole. The service drop is no longer close to the guy.

Date Completed Corrective Actions: 10/04/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

6. GO 128, Rule 17.1, Design, Construction and Maintenance

- During our field inspection of underground transformer #7295 at 3838 Lake Tahoe Blvd., ESRB staff observed that the enclosure was full of dirt and debris. A maintenance work order, due June 30, 2016, for LU crew to clean out the enclosure of the transformer was not completed.
This will require an outage in an area that will affect quite a few commercial customers. (Hotels, various businesses) It will need future scheduling.

Date Completed Corrective Actions: *Not completed at this time*

Response and Projected Completion Date for Additional Outstanding Items:
Due to the impact on the commercial businesses in the area an outage cannot be immediately scheduled but will be completed by the end of year 2017.

- During our field inspection of underground transformer #31827 at 4045 Lake Tahoe Blvd., ESRB staff observed a missing bolt holder which holds the bolt and lid in place. A maintenance work order, due June 25, 2016, for LU crew to install the bolt holder was not completed.
A crew member installed a new bolt. The lid is now secure.

Date Completed Corrective Actions: 10/05/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

- ESRB staff observed a broken enclosure located next to the underground transformer #30272 across from 3849 Regina Road, South Lake Tahoe.
The top lid of the N-36 box (broken enclosure) was replaced.

Date Completed Corrective Actions: 08/15/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

7. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures

The following LU handholes did not have LU ownership identification:

- Underground Transformer #75295 at 3838 Lake Tahoe Blvd., South Lake Tahoe
- Underground Transformer #112123 across from 3892 Lake Tahoe Blvd., South Lake Tahoe
- Underground Transformer #30253 at 3300 Lake Tahoe Blvd., South Lake Tahoe
- Underground Transformer #31827 at 4045 Lake Tahoe Blvd., South Lake Tahoe
- Underground Transformer #330272 across from 3859 Regina Road, South Lake Tahoe

Date Completed Corrective Actions: *Not completed at this time*

Response and Projected Completion Date for Additional Outstanding Items:
We currently have a vender making metal identification plates with the Liberty name. The plates will be scheduled for install as soon as they are completed. A recent update (10/19/2017) was they may be ready as soon as next week.

8. GO 128, Rule 35.1, Identification of Cables

The following LU handholes were missing identification on the cables:

- Underground Transformer #30253 at 3300 Lake Tahoe Blvd., South Lake Tahoe
A Crew member installed the proper identification tags on the cables, signifying the circuit and operating voltage.
- Underground Transformer #31827 at 4045 Lake Tahoe Blvd., South Lake Tahoe
A Crew member installed the proper identification tags on the cables, signifying the circuit and operating voltage.
- Underground Transformer #330272 across from 3859 Regina Road, South Lake Tahoe
A Crew member installed the proper identification tags on the cables, signifying the circuit and operating voltage.

Date Completed Corrective Actions: 10/06/2017

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

9. GO 128, Rule 35.3, Warning Signs

The following LU handholes did not have high voltage warning signs:

- Underground Transformer #75295 at 3838 Lake Tahoe Blvd., South Lake Tahoe
A Crew member secured high voltage warning signs inside the enclosure.
- Underground Transformer #30253 at 3300 Lake Tahoe Blvd., South Lake Tahoe
A Crew member secured high voltage warning signs inside the enclosure.
- Underground Transformer #31827 at 4045 Lake Tahoe Blvd., South Lake Tahoe
A Crew member secured high voltage warning signs inside the enclosure.
- Underground Transformer #330272 across from 3859 Regina Road, South Lake Tahoe
A Crew member secured high voltage warning signs inside the enclosure.

Date Completed Corrective Actions: 10/06/2016

Response and Projected Completion Date for Additional Outstanding Items:
No outstanding items at this location.

10. GO 128, Rule 17.2, Inspection

Response:

LU strives to follow all inspection standards as outlined by GO128, Rule 17.2 and will continue to review our internal policies to ensure compliance.

11. GO 165, Table 1, Distribution Inspection Cycles

- During our field inspection on July 28, 2017, LU Inspector could not open the lid to the underground transformer #112123 (across from 3892 Lake Tahoe Blvd., South Lake Tahoe). The previous inspection record indicated that on June 30, 2015 the LU Inspector, also, could not open the lid. LU has not inspected the underground transformer per GO 128 and GO 165 requirements.
A Crew member was able to open the lid and do a complete detailed inspection. He installed high voltage warning signs and cable tags for identification. This will require an outage in an area that will affect quite a few commercial customers in order to clean out the enclosure. (Hotels, various businesses) It will need future scheduling.

Date Completed Corrective Actions: 10/06/2017

Response and Projected Completion Date for Additional Outstanding Items:

Due to the impact on the commercial businesses in the area an outage cannot be immediately scheduled but will be completed by the end of year 2017.