

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

02/02/26

11:00 AM

R1812005

Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions.

Rulemaking 18-12-005
(Filed December 13, 2018)

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC'S (U 933-E)
PLAN TO SUPPORT ACCESS AND FUNCTIONAL NEEDS POPULATIONS DURING
DE-ENERGIZATION EVENTS**

Q4 2025 QUARTERLY REPORT

Dated: February 2, 2026

Jordan Parrillo
Manager of Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
701 National Ave,
Tahoe Vista, CA 96148
Telephone: 530-721-7818
jordan.parrillo@libertyutilities.com

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions.

Rulemaking 18-12-005
(Filed December 13, 2018)

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC’S (U 933-E)
PLAN TO SUPPORT ACCESS AND FUNCTIONAL NEEDS POPULATIONS DURING
DE-ENERGIZATION EVENTS**

Q4 2025 QUARTERLY REPORT

Pursuant to the California Public Utilities Commission’s (“Commission”) Decision (“D.”) 20-05-051 Appendix A, Section (g), Liberty Utilities (CalPeco Electric) LLC (“Liberty”) submits this Quarterly Report of Activities for the fourth quarter of 2025 (“Q4 2025”) regarding its efforts designed to support access and functional needs (“AFN”) populations during de-energization events.

1. Introduction

Liberty’s AFN Plan and its quarterly updates focus on identifying, communicating with, and supporting customers with AFN in its service territory. In Q4 2025, Liberty continued its focus on AFN outreach and engagement through community outreach events, engaging with CBOs, and other targeted outreach.

Based on its most recent customer data, Liberty serves approximately 43,828 residential customers in its California service territory. In total, there are 14,782 AFN and 262 medical baseline (“MBL”) customer accounts identified. The categories represented in the AFN customer count include low-income customers, individuals with disabilities, individuals with chronic conditions or injuries, individuals with limited English proficiency, and elderly customers.

The Commission defines AFN populations as “individuals who have developmental or

intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency or who are non-English speaking, a household with older adults, children, people living in institutionalized settings, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant.” (Decision 19-05-042 Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines) at A6 (integrating definition from Government Code §8593.3).) As such, Liberty identifies MBL customers as AFN. Customers may also self-identify as AFN customers. As described in Liberty’s Plan to Address AFN Populations During De-Energization Events (AFN Plan), Liberty conducts targeted community outreach to increase customer awareness of the option to identify as AFN, so that they may do so when appropriate.

2. Concept of Operations

2.1 Preparedness / Readiness (Before Power Shutoff)

2.1.1 Identifying Individuals with Access and Functional Needs

Liberty is committed in its efforts to identify customers and households with AFN.

Topic	2025 Q4 Update
Self-Identification	<ul style="list-style-type: none"> Self-Identification is available at California.libertyutilities.com and is a focus of Liberty’s AFN outreach campaign. Self-Identification form in English and Spanish is available at: https://california.libertyutilities.com/south-lake-tahoe/forms/afn-customer-application.html

2.1.2 AFN Support Resources

Topic	2025 Q4 Update
211 Care Coordination and Referral	<ul style="list-style-type: none"> • Liberty’s webpage dedicated to 211 customer resource information can be found at: https://california.libertyutilities.com/south-lake-tahoe/residential/my-account/my-bill/programs/211-programs.html • Liberty continues to maintain CBO and agency relationships throughout the service territory, including areas where 211 is not yet active. • El Dorado and Sierra Counties currently do not have active 211 services in place. • Other counties in Liberty’s service territory have varying degrees of support. • In 2023, new relationships were established with Connecting Point in Nevada and Placer Counties, resulting in 211 inclusions in tabletop exercises that will continue going forward where applicable.
Resource Planning and Partnerships	<ul style="list-style-type: none"> • In Q4, Liberty met with the Department of Developmental Services to provide GIS portal access to support awareness during PSPS events and discuss Liberty resources. • In Q4, Liberty’s PSPS and wildfire mitigation webpage link was added to the Joint IOU’s PrepareForPowerdown website. This improvement allows Liberty customers to access preparedness and resource information specific to their utility through an accessible shared resource page, and aligns Liberty with broader efforts to create streamlined information sharing for residents statewide.

2.1.3 Back-up Power Solutions

Topic	2025 Q4 Update
-------	----------------

Backup Battery Program for Medical Baseline Customers	<ul style="list-style-type: none"> • To support resiliency for its customers that depend on power for life-sustaining medical devices, Liberty is working to establish a program to offer eligible Medical Baseline customers a free portable backup battery. • In Q3 2024, Liberty determined the proposed scope and eligibility requirements for this program and is in the process of establishing a program budget. • In Q1, 2025, Liberty met with prospective implementation partners to explore opportunities; discussions are ongoing. • In March of 2025, Liberty met with a potential vendor for this program and requested a program proposal. • In August of 2025, Liberty received communication from the potential vendor that a proposal would not be available before the end of 2025 due to a variety of challenges with funding sources and staffing. Liberty is currently preparing to issue a Request for Proposals (RFP) for this program, with the goal of identifying qualified partners to support its implementation. • Updates to the UL 2473 Safety Standard,¹ specifically regarding safety markings for portable power packs with a rated capacity over 1kwh, have caused the IOUs to evaluate their existing or potential backup battery programs for alignment to UL certification. • In Q4 2025, Liberty finalized its Statement of Work (SOW) and RFP materials for its Backup Battery Program for MBL Customers. • Liberty plans to initiate an RFP for this program in February of 2026.
---	--

2.1.4 Customer Assistance Programs

Topic	2025 Q4 Update
Medical Baseline Allowance Program	<ul style="list-style-type: none"> • Liberty's MBL program provides an increase in the baseline allowance to qualified residential

¹ UL Portable Power Pack Testing.

	<p>customers. Liberty performs program outreach through bill inserts, radio, social media, digital advertisements, community events, targeted outreach, and collaboration with CBOs, agencies, and the Washoe Tribal community.</p> <ul style="list-style-type: none"> • No update in Q4 2025.
Energy Saving Assistance (“ESA”) Program	<ul style="list-style-type: none"> • Liberty offers the ESA program to eligible income or categorically qualified customers to provide energy-efficient home improvements at no cost to the customer. Liberty performs program outreach through bill inserts, radio, social media, digital advertisements, community events, targeted outreach, and collaboration with CBOs, agencies, and the Washoe Tribal community. • No update in Q4 2025.
California Alternate Rates for Energy (CARE)	<ul style="list-style-type: none"> • Liberty offers a 20 percent CARE discount to income or categorically qualified primary residential customers who receive their energy directly from Liberty or through a sub-meter, such as in a mobile home park or an apartment complex. Liberty performs program outreach through bill inserts, radio, social media, digital advertisements, community events, targeted outreach, and collaboration with CBOs through the California Alternate Rates for Energy (CARE) Community Organization Outreach Program (COOP), agencies, and the Washoe Tribal community. • No update in Q4 2025.
Additional PSPS Resources	<ul style="list-style-type: none"> • Liberty stocks emergency gift cards to support CARE or MBL customers in the event of an active PSPS at CRC locations, and is also prepared to support alternative lodging for critical MBL customers as needs are communicated by community partners or MBL customers.

2.1.5 Emergency Operations Centers

Emergency Operations Centers are in both Liberty’s South Lake Tahoe and North Lake Tahoe offices. Liberty can manage events partially or fully via virtual Incident Command with a paperless Incident Command System (“ICS”) form, job descriptions, event documentation, and virtual meeting venues. Staff members are trained to perform their roles in both formats.

Topic	2025 Q4 Update
De-energization Preparation Exercises	<ul style="list-style-type: none">• Liberty held its exercise planning meetings in Q1 and executed a tabletop exercise on May 28, 2025, and a full-scale exercise on June 26, 2025.• Exercises and planning meetings included Cal OES, CPUC, CAL FIRE, and Office of Energy Infrastructure Safety (OEIS), along with other public safety partners, including government, critical facilities, and AFN Community advocates that were able to attend.• In Q4, an internal lessons learned session was held specifically for CRC Lead positions after activated PSPS event on November 5, 2025.
ICS / Emergency Operations Center (EOC) Training	<ul style="list-style-type: none">• No updates in Q4 2025.

2.1.6 Customer Preparedness Outreach and Community Engagement

2.1.6.1 - AFN Outreach

Topic	2025 Q4 Update
CBO Outreach	<ul style="list-style-type: none">• Liberty continues to share information with CBOs and local partners to reach AFN audiences.• In Q4, Liberty pursued new connections with local CBOs, Community Service Solutions in Gardnerville, NV and Tahoe Truckee Helping Hands in Truckee, CA. CSS and TTHH agreed to share Liberty customer assistance program, AFN self-ID, and PSPS information with its clients through an established network serving vulnerable communities, including elderly and low-income residents.• In Q4, Liberty provided PSPS focused shelf stable meal boxes through collaboration with local senior nutrition programs. In addition to food items, boxes included customer assistance

	program applications and AFN self-ID information, and PSPS and wildfire mitigation educational materials. This effort was developed to address CBO / agency feedback, and utilized to reach vulnerable seniors with utility information through trusted and established networks.
AFN Outreach (direct)	<ul style="list-style-type: none"> • Liberty executes direct customer outreach to share information about customer programs (CARE, ESA, MBL) and PSPS awareness through a variety of methods, including community events, website resources, social media, direct mail, targeted outreach, radio ads (multicultural media), and advertisements. • See below for a list of Q4 2025 events.
Wildfire Messaging Customer Awareness Surveys	<ul style="list-style-type: none"> • Liberty utilized MDC Research to conduct post-season surveys in Q4 of 2025. Results will be reviewed and integrated into planning in 2026.
Tribal Engagement	<ul style="list-style-type: none"> • Liberty maintains a working relationship with the Washoe Tribal community and includes the Washoe Tribe as a public safety partner. • In Q4, Liberty partnered with Alpine County Behavioral Health to conduct outreach to the local Markleeville community, including Washoe Tribal community. • In Q4, Liberty collaborated with the Washoe Tribe to host a Community Resource Center in the Hung-A-Lel-Ti Tribal community during an active PSPS event.

Direct AFN outreach was conducted at the following events in Q4 of 2025:

- Coleville Community Open House, Coleville, CA, October 2, 2025
 - Liberty held an in-person Community Open House to reach rural customers residing in Coleville and Walker communities. Liberty shared information about customer assistance programs, AFN self-ID, PSPS and wildfire mitigation, and offered additional information to support customer inquiries.
- Barton Health Fair, South Lake Tahoe, CA, October 16, 2025
 - Liberty participated in a collaborative community outreach event to share information with local residents regarding PSPS preparedness and wildfire mitigation efforts, with a focus on available financial customer assistance programs, AFN self-identification, and energy efficiency opportunities.
- Coleville Community Open House, Coleville, CA, November 6, 2025
 - Liberty held an in-person Community Open House to reach rural customers

residing in Coleville and Walker communities. Liberty shared information about customer assistance programs, AFN self-ID, PSPS and wildfire mitigation, and offered additional information to support customer inquiries.

- Alpine County LIHEAP Collaboration Create the Good Lunch, November 7, 2025
 - Liberty collaborated with Alpine County Behavioral Health and LIHEAP on a luncheon event to share information with local residents regarding PSPS preparedness and wildfire mitigation efforts, with a focus on available financial customer assistance programs, AFN self-identification, and energy efficiency opportunities. Local LIHEAP administration was on site to support customers with in-person applications for funding.
- Coleville Community Open House, December 4, 2025
 - Liberty held an in-person Community Open House to reach rural customers residing in Coleville and Walker communities. Liberty shared information about customer assistance programs, AFN self-ID, PSPS and wildfire mitigation, and offered additional information to support customer inquiries.
- IMACA Food Distribution Event, Coleville, CA, December 23, 2025
 - Liberty attended a local food distribution event for local Coleville and Walker residents in Mono County. Liberty spoke with residents about customer assistance programs, AFN-self ID, energy efficiency opportunities, and PSPS preparedness by distributing educational materials and applications.

2.1.6.2 - Engagement Through Participation in Working Groups and Councils

Community events are a critical area of opportunity to expand customer communications in terms of AFN identification and awareness of available resources.

List of meetings Liberty participated in during Q4 2025:

- SMJU AFN Collaboration Meeting, October 21, 2025
- Mono County AFN Council Workgroup Meeting, November 11, 2025
- Mono County Unified Command Meeting, December 3, 2025
- Q4 AFN IOU Collaborative Council Meeting, December 9, 2025
- SMJU AFN Collaboration Meeting, December 16, 2025
- Q3 AFN IOU Statewide Council Meeting, December 18, 2025

2.1.6.3 – Wildfire Messaging Customer Awareness Surveys

Topic	2025 Q4 Update
Planned Survey Efforts	<ul style="list-style-type: none"> Liberty utilized MDC Research to conduct post-season surveys in Q4 of 2025. Results will be reviewed and integrated into planning in 2026.

2.1.7 Community Resource Centers

Topic	2025 Q4 Update
CRC Locations and Planning	<ul style="list-style-type: none"> No update in Q4 2025.

2.2 PSPS Activation (During Power Shutoff– Emergency Operations Center Activated)

2.2.1 Notification During De-Energization

Topic	2025 Q4 Update
Use of Notifications and Updates to Notification Protocols	<ul style="list-style-type: none"> Liberty experienced one PSPS event in Q4 2025 and activated notification protocols.

2.2.2 Community Resource Centers

Topic	2025 Q4 Update
Utilization of CRCs	<ul style="list-style-type: none"> Liberty experienced one PSPS event in Q4 2025 and a CRC location was activated in Markleeville, CA in partnership with the Washoe Tribe.

2.3 Recovery (After Power Has Been Restored)

2.3.1 Support to Customers with Access and Functional Needs

Topic	2025 Q4 Update
Customer Support / Notification	<ul style="list-style-type: none"> Liberty will continue to maintain relationships and communication with local organizations to remain aware of customer needs before, during, and after PSPS events. No update in Q4 2025.

2.3.2 After Action Reviews and Reports / Lessons Learned and Feedback

Topic	2025 Q4 Update
AARs	<ul style="list-style-type: none"> After-action reviews (AARs) with leadership and the Incident Management Team were conducted

	<p>after 2025 tabletop and functional exercises. Copies of these AARs were provided as Attachments 2 and 3 to Liberty's 2025 Pre-Season Report.²</p> <ul style="list-style-type: none"> • Lessons learned and feedback from exercises and events will be recorded and used to create action items. • Liberty assessed documentation improvements from the November 2024 PSPS events' lessons learned. Liberty implemented these changes to support more streamlined reporting before, during, and after PSPS events. • Liberty's AAR of its November 5, 2025 PSPS Event included three lessons learned and resolutions related to CRCs: <ul style="list-style-type: none"> ○ Regarding CRC staffing, Liberty will reassess its list of CRC leads to address recent staffing changes; ○ Regarding CRC signage, Liberty will put up signs outside CRC locations during future PSPS events; and ○ Regarding CRC supplies, Liberty will determine if there is a reasonable solution to better prepare customers using well water who requested larger-sized bottles of water for toilet flushing.
--	---

3. Conclusion

Liberty continues to seek opportunities to enhance outreach effectiveness and expand CBO networks across its service territory. Liberty prioritizes identifying and engaging with AFN populations in its service area and will continue working with local governments, public safety organizations, tribal communities, representatives of AFN communities, and CBOs to communicate with AFN customers in compliance with guidelines in R.18-12-005.

² Liberty's 2025 Pre-Season Report.

Respectfully submitted,

/s/ Jordan Parrillo

Jordan Parrillo
Manager of Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
701 National Ave,
Tahoe Vista, CA 96148
Telephone: 530-721-7818
jordan.parrillo@libertyutilities.com

Dated: February 2, 2026