



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

FILED

07/06/26

04:59 PM

C2607013

James and Deborah Sajdak,

Complainants,

vs.

Liberty Utilities (CalPeco Electric) LLC
(U933E),

Defendant.

Case No. (C.) _____

COMPLAINT
(Rule 4.2)

COMPLAINANTS	DEFENDANT
James and Deborah Sajdak Attn: Sher A. Beard, Esq. High Sierra Law 1187 N Willow Ave. #103-810 Clovis, CA 93611 T: 559-492-9690 Email: sher@highsierralaw.com	Liberty Utilities (CalPeco Electric) LLC d/b/a CalPeco Electric (U993E) Attn: Daniel Marsh, Manager, Rates and Regulatory Affairs 933 Eloise Avenue South Lake Tahoe, CA 96150 T: 562-299-5104 Email 1: dan.marsh@libertyutilites.com Email 2: bob.dodds@liberty-energy.com

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A)

JAMES AND DEBORAH SAJDAK

COMPLAINANT(S)

VS.

(B)

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U933E)

DEFENDANT(S)

(Include Utility "U-Number", if known)

(for Commission use only)

(C)

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☒ YES

☐ NO

Has staff responded to your complaint?

☒ YES

☐ NO

Did you appeal to the Consumer Affairs Manager?

☐ YES

☒ NO

Do you have money on deposit with the Commission?

☐ YES

☒ NO

Amount \$ _____

Is your service now disconnected?

☐ YES

☒ NO

COMPLAINT

(D)

The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
James Sajdak	3950 La Crosse Drive, Carnelian Bay, CA 96140	(530) 581-0118
Deborah Sajdak	3950 La Crosse Drive, Carnelian Bay, CA 96140	(530) 581-0118

respectfully shows that:

(E)

Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
Liberty Utilities (CalPeco Electric) LLC	9750 Washburn Road, Downey, CA 90241	(562) 805-2014

(F)

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

Please see attached Complaint, Section IV.

(G) Scoping Memo Information (Rule 4.2(a))

(1) The proposed category for the Complaint is (check one):

☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)

☐ ratesetting (check this box if your complaint challenges the reasonableness of a rates)

(2) Are hearings needed, (are there facts in dispute)? ☒ YES ☐ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint

(4) The issues to be considered are (Example: The utility should refund the overbilled amount of \$78.00):

Please see attached Complaint, Section V.

- (5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.

Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09):	08/17/2026
Hearing (Example: 7/1/09)	10/14/2026

Explain here if you propose a schedule different from the above guidelines.

(H)

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

Please see attached Complaint, Section VI.

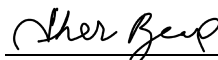
(I)

OPTIONAL: I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

sher@highsierralaw.com

(J)

Dated Clovis, California, this 3 day of July, 2026
(City) (date) (month) (year)



Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

(K)**REPRESENTATIVE'S INFORMATION:**

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative:	Sher A. Beard, Esq.
Address:	1187 N Willow Ave. #103-810, Clovis, CA 93611
Telephone Number:	(559) 492-9690
E-mail:	sher@highsierralaw.com
Signature	

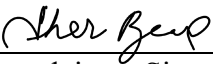
VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(L)

Executed on July 3, 2026, at Clovis, California
(date) (City)


(Complainant Signature)

VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(M)

Executed on _____, at _____, California
(date) (City)

Signature of Officer

Title

(N) NUMBER OF COPIES NEEDED FOR FILING:

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one defendant, then you must submit a total of eight (8) copies (Rule 4.2(b)).

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

(O) Mail paper copies to: California Public Utilities Commission
Attn: Docket Office

505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACYNOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a public record and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.



Signature

July 3, 2026

Date

Sher A. Beard

Print your name

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

James and Deborah Sajdak,

Complainants,

vs.

Liberty Utilities (CalPeco Electric) LLC
(U 933-E),

Defendant.

Case No. (C.) _____

COMPLAINT

I. INTRODUCTION

1. Complainants James and Deborah Sajdak own the property located at 3950 Lacrosse Drive in Carnelian Bay, California.

2. The Complainants have owned the subject property for twenty-nine years.

3. On March 27, 2025, Liberty Utilities, without prior notice to Complainants, completely removed one 18-inch diameter Sierra white fir tree and performed unreasonable, excessive, and negligent limbing of two additional 20-inch diameter Sierra white fir trees. Such work exceeded any authorization or permission granted by Complainants and went well beyond what was reasonably necessary to protect Liberty Utilities' infrastructure.

4. The three native Sierra white fir trees at issue in this matter were approximately 100 feet in height and in excellent condition.

5. The trees provided a natural visual screen from the neighboring property and were a significant feature of the landscape, constituting a substantial factor in Complainants' decision to purchase the property.

6. Complainants have filed this Complaint based on Liberty Utilities' unreasonable vegetation management practices and violations of statutory and regulatory requirements.

II. COMPLAINANTS

7. James and Deborah Sajdak are property owners in the County of Placer, State of California and are Liberty Utilities customers.

III. DEFENDANT

8. Liberty Utilities (CalPeco Electric) LLC is a California-regulated investor-owned public utility subject to the jurisdiction of the California Public Utilities Commission ("CPUC"). (Public Utilities Code, § 216(a)).

IV. DETAILS OF COMPLAINT

9. The Complainants incorporate and reassert paragraphs 1 through 8 of this Complaint herein.

10. The manner in which Liberty Utilities conducted its vegetation management activities in this matter violated California statutory and regulatory requirements. Such conduct included, but was not limited to, the unreasonable, excessive, and negligent removal of substantially more vegetation than was necessary to protect Liberty Utilities' infrastructure.

11. Liberty Utilities also failed to follow its own written procedures requiring advance notice to homeowners prior to commencing work and, if the homeowner was unavailable, the placement of a door hanger or similar notice advising of the planned vegetation work.

2021 Initial Contact

12. On May 11, 2021, Complainant received a door hanger left by Tim Lipovsky, a consulting Utility Forester for Liberty Utilities, advising that pruning of the three fir trees would proceed if Liberty did not receive a response within three days. The notice stated that the trees

would be pruned using directional or natural target trimming practices.

13. The location of the power lines in relation to the fir trees at issue was not accurately represented in the notice left by Mr. Lipovsky. The notice incorrectly depicted the power lines as running through the limbs of the fir tree, when the clearance between the power line and the nearest limbs was at least six to eight feet.

14. As a result, the Complainants contacted Liberty Utilities, and no vegetation work was performed on this occasion.

May 2024 Attempted Vegetation Work Without Prior Notice

15. In approximately May 2024, Complainants again observed a tree crew on their property and discovered that a subcontractor retained by Liberty Utilities was attempting to perform vegetation work to Complainants' fir trees, without providing prior notice and beyond what was reasonable and necessary to safely maintain their infrastructure. Complainants instructed the crew to leave the property since the limbs were beyond the minimum 4-foot clearance required by CPUC guidelines.

16. Following the May 2024 attempted vegetation work, Complainants contacted Steven Tognolini of Liberty Utilities and advised him that no tree work should be performed on Complainants' property unless and until the clearance between the power lines and the trees was less than four feet.

17. On May 28, 2024, Mr. Tognolini left a door hanger at Complainants' residence that cited various California Code sections previously discussed in correspondence between the parties.

June 3, 2024 Correspondence and Informal CPUC Complaint

18. On May 31, 2024, Complainants sent a letter to Eric Oiler, Vegetation Manager, with Liberty Utilities expressly informing Liberty Utilities that they did not consent to Liberty

Utilities accessing their property or removing any portion of the fir trees where the clearance exceeded four feet.

19. On the same date, Complainants also filed an informal complaint with the California Public Utilities Commission (CPUC).

July 5, 2024 Consumer Affairs Branch Response to Informal Complaint

20. On July 5, 2024 Complainants received a response letter from the Consumer Affairs Branch (CAB) of the CPUC summarizing the documentation provided by Liberty Utilities and the Complainants.

21. Liberty Utilities reported to the Consumer Affairs Branch that, upon field inspection, it determined the tree required trimming on one side because it was growing into the service lines. This statement was inaccurate and appears to have been made to justify Liberty's repeated attempts to limb the fir trees. A photograph provided by Liberty's subcontracted tree company to the CAB, clearly shows approximately six to eight feet of clearance between the closest limb and Liberty's service line. (*See Exhibit 1.*)

22. The CAB response letter also inaccurately states that, on May 1, 2024, tree trimming was refused at the property due to past experiences. This statement appears to arise from an onsite conversation between Doug Dickson, General Foreman for Wright Tree Service, and Complainants. However, neither Wright Tree Service, Liberty Utilities, nor any other tree company had previously trimmed trees on Complainants' property.

23. The CAB response letter further stated that Liberty Utilities would continue to **monitor** the tree and other vegetation in relation to the electrical conductor and would inform Complainants of its findings. Rather than monitor the trees and provide notice of any findings, Liberty Utilities later entered Complainants' property in March 2025, without prior notice, and removed one 18-inch fir tree, and excessively limbed two 20-inch fir trees.

July 2024 Site Visit by Damen Evanson

24. In July 2024, after receiving the response from the CAB, Damen Evanson, a representative of Liberty Utilities' Operations Department, visited the Complainants' property and observed the site conditions. Mr. Evanson stated **there was no reason to limb the fir trees** and **that alternative measures would be reviewed** if the limbs, which were approximately eight feet from the power lines at the time of his visit, later became a concern.

25. Complainants informed Mr. Evanson that, after the 12,500 – 14,400 volt power lines left the power pole located at the corner of Complainants' property, they did not provide electricity to any homes in the area. Complainants proposed that removal of the unused power lines would eliminate a potential fire hazard for Liberty Utilities and remove the need to limb Complainants' fir trees.

26. In response to Complainants' proposal to remove the lines, Mr. Evanson contacted Liberty Utilities' Engineering Department who requested that alternative measures be taken for a mutual resolution.

27. Mr. Evanson further stated that a new power pole was scheduled for installation within the next few years and that, if necessary, its placement could be adjusted to provide additional clearance from the fir trees.

28. Mr. Evanson proposed other additional mutual beneficial solutions such as the installation of an extended support arm and placing a plastic shield over the power line.

July 10, 2024 CAB and Eric Oiler Correspondence

29. On July 10, 2024, Complainants sent a second letter to the CAB stating that, based on their discussion with Damen Evanson, a potential resolution had been identified that would provide mutual benefit to both Liberty Utilities and Complainants. Complainants copied Eric Oiler on the correspondence regarding the proposed resolution.

30. After receiving no response from Mr. Oiler indicating that the proposed resolution was unacceptable or infeasible, Complainants, in good faith, removed the no trespassing signs from their property.

September 2024 Postcard

31. In approximately September 2024, Complainants received a generic postcard in the U.S. Mail stating that Liberty Utilities intended to perform vegetation maintenance in the Complainants' neighborhood in the coming weeks.

32. Based on Complainants' prior discussions with Damen Evanson regarding a proposed mutual resolution, and the absence of any response from Eric Oiler disputing that resolution, Complainants had no reason to believe Liberty intended to perform work on their fir trees and assumed Liberty Utilities would provide specific notice required by its written protocol, including homeowner contact and/or a door hanger before commencing any vegetation work on their property.

March 27, 2025 Unauthorized Tree Work

33. Without Complainants approval or knowledge, on March 27, 2025, Liberty Utilities and their tree contractor, entered Complainants' property and removed one 18-inch diameter fir tree and excessively and unreasonably limbed two 20-inch diameter fir trees.

34. Complainants first became aware of the vegetation work when neighbors contacted them and reported that a Liberty Utilities vehicle and a tree-trimming vehicle were at Complainants' property performing tree removal.

Post Incident Liberty Office Visits and Follow-Up Correspondence

35. Upon learning of the vegetation work, Complainants immediately left work and went directly to Liberty Utilities' Tahoe Vista office. The office was closed, and Complainants'

request to speak with a manager was denied.

36. On March 27, 2025, Complainants received a call from Eric Oiler, who stated that Liberty believed it had authority to perform the work notwithstanding Complainants' objections under General Order 95, Rule 35. Mr. Oiler claimed that the direction from the CAB allowed Liberty Utilities to access Complainants' property and limb and cut the fir trees.

37. Complainants informed Mr. Oiler that Liberty Utilities statement to the CAB that the tree limbs were growing **into** the service lines was false and that Liberty Utilities further stated to the CAB that Liberty Utilities would continue to **"monitor"** the tree and that there was no approval to limb or remove any trees.

38. Complainants further advised Eric Oiler that a mutual resolution had previously been discussed with Liberty's Operations Department and documented in correspondence on which Mr. Oiler was copied. Mr. Oiler responded that the trees had already been limbed, one tree had been removed, and nothing further could be done.

39. Dissatisfied with Mr. Oiler's response, on or about April 1, 2025, Complainants went to Liberty Utilities' South Lake Tahoe office and spoke with Peter Stoltman, Senior Manager of Wildfire Prevention. Mr. Stoltman stated that the trees had already been cut, and that Liberty would not provide any further resolution.

Damen Evanson/Peter Stoltman Correspondence

40. On May 27, 2025, Complainants sent a letter to Damen Evanson requesting written confirmation of the alternative measures he had discussed with Complainants on behalf of Liberty Utilities during his July 2024 visit to Complainants' property.

41. On June 10, 2025, Peter Stoltman denied Complainants' request for written confirmation from Damen Evanson regarding the alternative measures discussed during his July 2024 site visit. Instead, Mr. Stoltman issued a generic response stating that the CPUC requires

utilities to maintain clearance between power lines and vegetation, and that Liberty had recently completed what it characterized as necessary tree pruning on Complainants' property.

Arborist Evaluation

42. On September 17, 2025, Thomas Davis, a certified arborist performed an evaluation of the three Sierra white fir trees at issue.

43. Mr. Davis found the 18-inch diameter tree that was unlawfully removed by Liberty had been in excellent condition (1.0 condition rating) at the time of removal. Mr. Davis described the tree as a "Perfect specimen with excellent form and vigor, along with a well-balanced crown. Trunk is sound and solid. No apparent pest problems. Normal to exceeding shoot length on new growth. Normal leaf size and color. Exceptional life expectancy for the species."

44. Mr. Davis found the 20-inch diameter trees pruned by Liberty were in excellent condition prior to being excessively trimmed, which resulted in a decreased rating of "good" or a 0.9 condition rating as the branch spacing/structure was adversely affected by the utility clearance pruning.

Claim History

45. On December 10, 2025, Complainants contacted Amy Walt, Customer Relations, at Liberty Utilities' main office in Canada to discuss their demand for damages.

46. At Ms. Walt's request, Complainants submitted a formal demand letter seeking \$86,796.44 for damages arising from Liberty's unauthorized removal of one fir tree and excessive limbing of two additional fir trees.

47. The demand included property damage, diminution in property value, time spent attempting to resolve the matter, and related distress. The tree-damage valuation portion of the demand was prepared by certified arborist Thomas Davis using the trunk formula technique and

recognized arboricultural valuation standards.

Settlement Negotiations

48. On March 4, 2026, Complainants participated in a conference call with Sharon Yang, Senior Director of Legal Services for Liberty Utilities, during which the parties discussed Liberty Utilities' actions over the preceding four years. During that call, Liberty Utilities offered to resolve the matter for \$25,000.00.

49. On April 1, 2026, Complainants counter demanded \$79,000.00.

50. On April 8, 2026, Liberty Utilities counter offered \$30,000.00.

51. On April 13, 2026, Complainants counter demanded \$70,000.00.

52. On April 17, 2026, Liberty Utilities increased their offer to \$35,000.00.

53. On April 23, 2026, Complainants re-demanded \$70,000.00.

54. On April 27, 2026, Liberty Utilities made a final offer of \$42,000.00.

55. On April 29, 2026, Complainants retained High Sierra Law to represent them in this matter.

56. On the same date, Complainants' counsel emailed Sharon Yang proposing that the parties resolve the matter for \$56,000.00, which represented the midpoint between Liberty Utilities' final offer of \$42,000.00 and Complainants' final demand of \$70,000.00, in an effort to avoid the additional expense of litigation.

57. On May 4, 2026, Sharon Yang of Liberty Utilities declined Complainants' \$56,000.00 offer to compromise.

V. ISSUES TO BE CONSIDERED

58. The manner in which Liberty Utilities conducted its tree trimming activities on the Complainants' property violated multiple statutory and regulatory provisions of California Law.

59. The investigation is on-going, and the Complainants reserve the right to amend this formal complaint as new information becomes known.

A. Jurisdiction

60. The CPUC is authorized to hold Liberty Utilities accountable for the many violations of law Liberty Utilities committed on the Complainants' property. "The commission may supervise and regulate every public utility in the State and may do all things, whether specifically designated in this part or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction." (Public Utilities Code § 701.)

B. Easement and Lack of Authority

61. For nearly three decades, Liberty Utilities has maintained and accessed this power line without requiring any broad vegetation-management corridor or extensive clearance into Complainants' property.

62. Prior to 2021, Liberty Utilities had never historically exercised any right to significantly trim or remove the trees at issue. As a result, historical use does not permit the complete removal or drastic cutting absent express owner permission.

63. The extent of cutting performed by Liberty Utilities **far exceeded what was necessary** for the operation, maintenance, or access to Liberty Utilities' existing poles and wires.

C. Liberty Utilities' Violations of Law

1. Violation of General Order (GO) 95, Rule 35 – Excessive and Unreasonable

64. General Order 95, Rule 35 "demands certain vegetation management activities be performed in order to establish necessary and reasonable clearances." Here, however, Liberty went considerably further than establishing necessary and reasonable clearances.

65. Liberty has provided no authority to support that its destruction of the mature and healthy fir tree and drastic cutting of two additional mature and healthy fir trees was necessary or

reasonable.

66. The Complainants' property is located in a Very High Fire Hazard Severity Zone (FHSZ), as designated by CAL FIRE¹ and is located within a State Responsibility Area (SRA), making it subject to Table 1, Case 14 of General Order 95.²

67. The powerline at issue is a 12kv (12,000 volt) primary distribution power line.

68. General Order 95, Table 1, Case 14 *guidelines* provide the minimum clearance for a 12,000 volt line is 48 inches (4 feet).

69. The base of the fir tree that was completely removed by Liberty was located approximately 9 feet, 6 inches from the distribution line.

70. The bases of the two fir trees that were trimmed excessively by Liberty were located 14 and 15 feet from the distribution line, respectively.

71. For a 12 kV distribution line, GO 95 requires only limited vegetation clearance measured in feet, not the excessive structural pruning and complete removal as performed here.

72. There were several less destructive pruning methods available that aligned with ANSI A300 standards that would have achieved required clearances while preserving the structural and biological integrity of the fir trees.

73. Liberty Utilities' drastic actions to remove and excessively trim these three trees far exceeded what was reasonably necessary to maintain required clearances and therefore violated GO 95, Rule 35.

2. Violation of General Order (GO) 95, Rule 35 and California Public Resources Code Section 4293 – Removal of Non-Hazard Tree

74. GO 95, Rule 35 requires "that dead, rotten or diseased trees or dead, rotten or

¹ <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>

² https://ia.cpuc.ca.gov/gos/GO95/go_95_table_1.html

diseased portions of otherwise healthy trees overhang or lean toward and may fall into a span of supply or communication lines, said trees or portions thereof should be removed,” when a utility has actual knowledge of such a risk.

75. California Public Resources Code 4293 requires that, “[d]ead trees, old decadent or rotten trees, trees weakened by decay or disease and trees or portions thereof that are leaning toward the line which may contact the line from the side or may fall on the line shall be felled, cut, or trimmed so as to remove such hazard.”

76. The fir trees that were removed and trimmed were healthy, structurally sound, and did not pose a hazard to Liberty’s infrastructure, as demonstrated by their condition, distance from the conductors, and subsequent arborist evaluation.

77. Liberty’s hazard position is unsupported by the evidence and contradicted by Liberty’s own employee, Damen Evanson.

3. Reservation of Rights – General Order 165

78. Liberty Utilities has not produced any inspection records, patrol reports, hazard classifications, or work-order documentation establishing that the vegetation work at issue was prompted by or required as the result of a facility inspection.

79. To the extent Liberty contends that its actions were justified by an inspection or hazard determination, the Commission should require Liberty to produce all inspection, maintenance, and corrective-action records required under General Order 165, and reserve jurisdiction to determine whether Liberty complied with GO 165’s inspection, documentation, and corrective-action requirements.

80. The absence of such documentation further calls into question the legitimacy of Liberty’s claimed authority to perform the work.

D. Violation of Liberty Utilities' Policies

81. Liberty Utilities' internal policies and procedures expressly require notifying customers before performing vegetation work.

82. Liberty's departure from its own internal policies further demonstrates non-compliance with Commission-regulated safety obligations.

VI. RELIEF REQUESTED

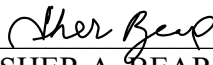
The Complainants request a hearing on the merits of this complaint and/or request a hearing on this matter upon motion of the CPUC pursuant to Public Utilities Code Section 705.

Complainants respectfully request that the California Public Utilities Commission issue the following orders:

1. Find that Liberty Utilities violated General Order 95, Rule 35, in connection with the vegetation work performed on the Complainants' property on March 27, 2025.
2. Find that Liberty's vegetation work on the three fir trees was unreasonable, excessive, and unnecessary.
3. Find that Liberty Utilities' conduct was willful, as demonstrated by its unauthorized and unannounced vegetation work after representing to the CPUC CAB that it would simply monitor the trees and inform Complainants of its findings.
4. Impose appropriate fines and penalties pursuant to Public Utilities Code section 2107 sufficient to deter future misconduct.
5. Order Liberty Utilities to produce all inspection records, hazard assessments, patrol reports, and work-order documentation related to the subject trees and the March 27, 2025 work.
6. Order Liberty Utilities to provide the scope of any future vegetation work on the Complainants' property in writing at least 14 days in advance of performing any

- vegetation work.
7. Order Liberty Utilities and its contractors to abide by and comply with ANSI A300 trimming standards for all future authorized vegetation work on Complainants' property.
 8. Grant such other and further relief as the Commission deems just and proper.

Respectfully Submitted,

By: 
SHER A. BEARD

HIGH SIERRA LAW
1187 N Willow Ave. #103-810
Clovis, CA 93611
Telephone: 559-492-9690
Email: sher@highsierralaw.com

DATED: July 3, 2026

Attorney for COMPLAINANTS

EXHIBIT 1

636200_1_8.jpg

