

APPENDIX C

E20201117-01 MOUNTAIN VIEW FIRE SED INCIDENT INVESTIGATION REPORT

PUBLIC

CALIFORNIA PUBLIC UTILITIES COMMISSION
Safety and Enforcement Division
Electric Safety and Reliability Branch

Incident Investigation Report

Report Date: July 24, 2026

Incident Number: E20201117-01 (Mountain View Fire)

Utility: Liberty Utilities (Liberty)

Date and Time of the Incident: November 17, 2020, 1200 hours

Location of the Incident: 106834 US-395
Coleville, CA 96107
County: Mono

Fatality / Injury: One Fatality and One Injury

Property Damage: 20,835 acres, including 97 structures, burned in Antelope Valley

Utility Facilities Involved: Topaz 1261, 12.5 kilovolt (kV) Circuit

Violation: Yes

I. Summary

On November 17, 2020, at approximately 1200 hours, the Mountain View Fire started adjacent to 106834 US-395 in the City of Coleville in Mono County. The Mountain View Fire burned approximately 20,835 acres of vegetation and watershed in a Tier 2 High Fire Threat District area, destroyed or damaged 97 homes and structures, and resulted in one fatality and one injury.

The Safety and Enforcement Division's (SED's) investigation of the incident revealed that Liberty violated several requirements in General Order (GO) 95 Rules for Overhead Electric Line Construction 31.1:

GO Rules	Violations
GO 95, Rule 31.1	Failure to account and design for known high wind conditions.
GO 95, Rule 31.1	Lack of design standards for equipment actively being operated.
GO 95, Rule 31.1	Failure to ensure results from a pole loading calculation were correct in order to maintain the facilities for their intended use.

A. Rule Violated

GO 95, Rule 31.1, Design, Construction and Maintenance states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard.

For all particulars not specified in General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions.

B. Witnesses

No.	Name	Title
1	Samuel Mandell	CPUC Investigator

C. Evidence

No.	Source	Description
1	Liberty	Initial Incident Report, 11/17/2020

No.	Source	Description
2	Liberty	20-day Incident Report, 12/15/2020
3	CPUC	Evidence Photos, 12/10/2020
4	CPUC	Data Request SED-001, 12/29/2020
5	CPUC	Site Visit Observation Report, 01/05/2021
6	Liberty	Data Request Response #1, 03/15/2021
7	Liberty	Data Request Response #1, Supplemental, 03/29/2021
8	CPUC	Data Request SED-002, 09/07/2021
9	Liberty	Data Request Response #2, 12/03/2021
10	CPUC	Data Request SED-003, 06/24/2022
11	CPUC	FOIA Request 07/12/2022
12	Liberty	Data Request Response #3, 08/01/2022
13	Bureau of Land Management	FOIA Response 1, 05/12/2025
14	CPUC	Data Request SED-004, 09/24/2025
15	Bureau of Land Management	FOIA Response 2, 05/20/2025
16	Liberty	Data Request Response #4, 10/23/2025
17	CPUC	Data Request SED-005, 04/24/2026
18	Liberty	Data Request Response #5, 06/05/2026

II. Background

On November 17, 2020, at approximately 1200 hours, the Mountain View Fire ignited adjacent to 106834 US-395 in Coleville, Mono County. The location is within a Tier 2 High Fire Threat District (HFTD).¹ The fire burned approximately 20,835 acres of land, destroyed or damaged 97 homes and structures, and resulted in one fatality and one injury. The fire also resulted in outages that affected 654 customers. The Antelope Valley Fire District responded to the fire and the Bureau of Land Management (BLM) assumed Incident Command of the fire shortly thereafter.

On November 17, 2020, at 1203 hours, the Antelope Valley Fire Department received an alarm for the fire. At 1205 hours, the first fire truck arrived on scene. On November 23, 2020, the fire was 70% contained. The remaining 30% was on land covered with snow. On December 11, 2020, the fire was fully contained.

¹ As defined by the CPUC [High Fire Threat District \(HFTD\) App.](#)

On November 17, 2020, at 1148 hours, weather station Walker WALC1, located approximately 3.0 miles north from the incident location, recorded wind speeds of 25.0 miles per hour (mph) and a peak wind gust of 43.0 mph. The ambient condition around the time of ignition was approximately 67 degrees Fahrenheit with 11% relative humidity. The weather station is located at an elevation of 5,440 feet above sea level.²

On November 17, 2020, at 1148 hours, weather station MCMWTC Bridgeport, located approximately 11.2 miles south from the incident location, recorded wind speeds of 20.0 mph and a peak wind gust of 39.0 mph. The ambient condition around the time of ignition was approximately 55 degrees Fahrenheit with a 16% relative humidity. The weather station is located at an elevation of 6,748 feet above sea level.³

On November 17, 2020, at 1200 hours, weather station TPZ1261-Eastside Ln, located approximately 4,100 feet northeast from the incident location, recorded wind speeds of 31.3 mph and a peak wind gust of 66 mph. The ambient condition around the time of ignition was approximately 63.1 degrees Fahrenheit with a 13% relative humidity. The weather station is located at an elevation of 5,519 feet above sea level.⁴

On November 17, 2020, at 1505 hours, approximately three hours after the fire started, Liberty reported the incident to the SED under the property damage criterion.

² Weather conditions per MesoWest (www.mesowest.utah.edu) and BLM FOIA Request 1, CAL FIRE Investigation Report 20CAOVD030860, pg. 12.

³ Weather conditions per MesoWest (www.mesowest.utah.edu).

⁴ Weather conditions per Western Weather Group ([Western Weather Group - Liberty Weather](#)).

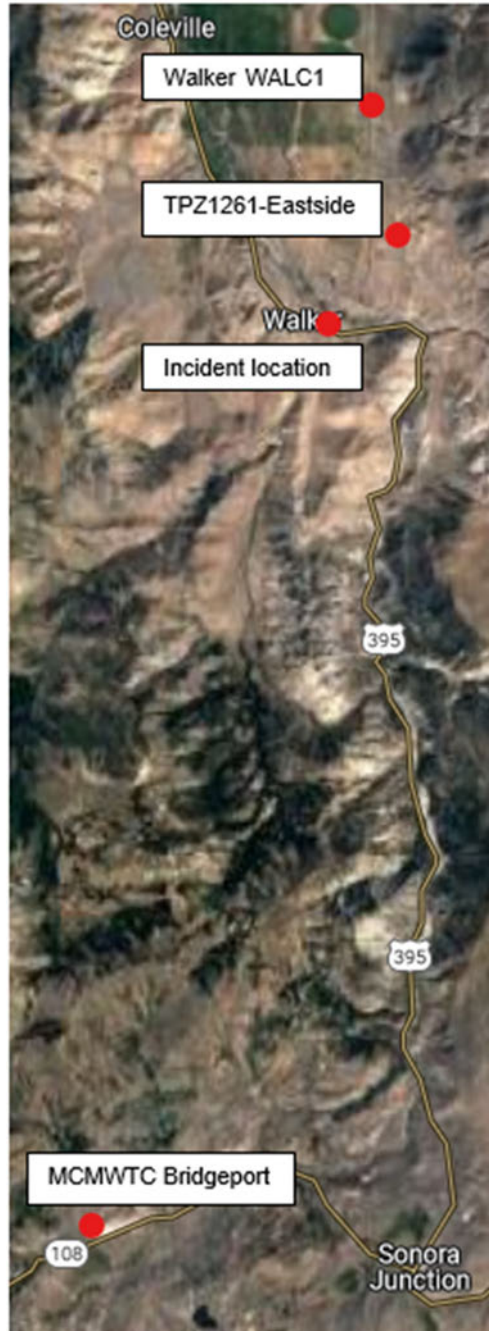


Figure 1: Weather Stations and Incident Location Approximated on Google

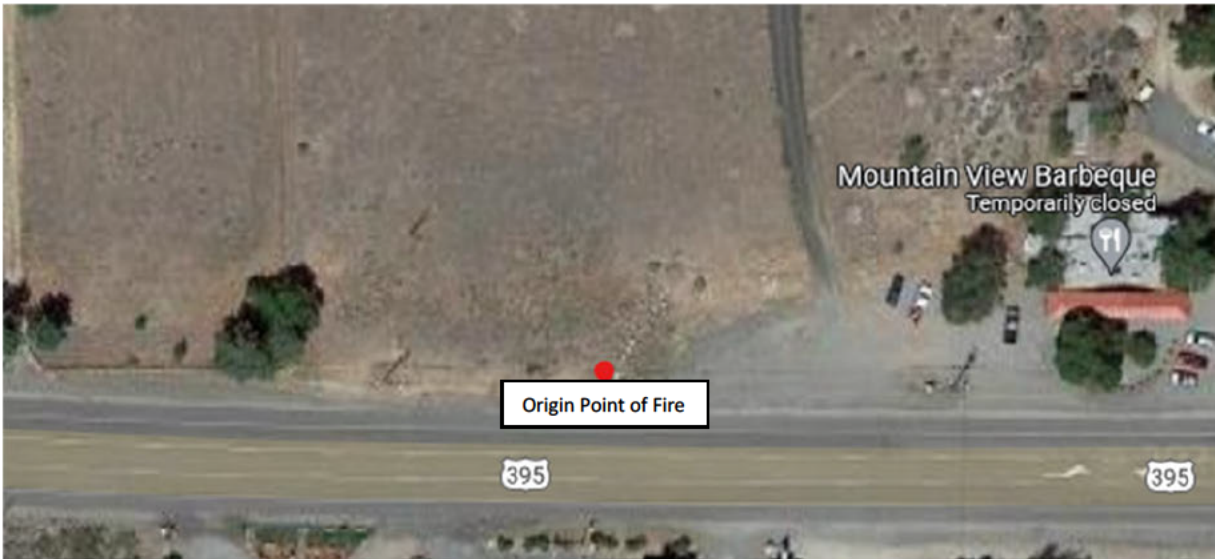


Figure 2: The origin of the fire via Google Maps

III. SED Review and Analysis

SED's investigation included five data requests to Liberty Utilities. The requested data included records pertaining to vegetation management, inspections, maintenance, protective device operation, outage impact, standards and procedures, equipment technical specifications, and more.

On January 5, 2021, SED conducted a site visit at 106824 US-395 to observe the incident location. SED observed the flagged location of the downed power line and saw the incident span, which had already been repaired upon arrival. SED also discussed the incident with three of the first responders from the Antelope Valley Fire District.

SED observed the conductors taken into evidence while they were in possession of the California Department of Forestry and Fire Protection (CAL FIRE). On July 12, 2022, SED filed a Freedom of Information Act (FOIA) request with BLM for the fire authority report. On May 12 and 20, 2025 SED received the CAL FIRE report and supporting materials from BLM in response to the FOIA request.

A. Vegetation Management

The incident location at 106834 US-395 is an area dominated by grass, sagebrush and pinyon-juniper. There was no evidence of vegetation or other foreign object contact being relevant to the cause of the incident. There were no trees within striking distance of the span, and the only vegetation present near the incident span was ankle high grasses. Neither Liberty nor BLM suggested vegetation contact as a suspected cause of

the fire.⁵ A section of the repaired span at the incident location can be seen in Figure 3 below.



Figure 3: Repaired span at the incident location⁶

B. Liberty's Distribution Facilities Inspection Program

Rural areas, such as the incident location, are defined by GO 165 as “those areas with a population of less than 1,000 persons per square mile.” GO 165 requires biennial patrol inspections and detailed inspections at five-year intervals for rural areas. In Tier 2 or Tier 3 HFTD areas, such as the incident location, GO 165 requires annual patrol inspections.

⁵ Liberty-02: Ignition testimony in A.25-06-017 pg. 6 and BLM FOIA Request 1, CAL FIRE Investigation Report 20CAOVD030860, pg. 5 and 21.

⁶ Photograph taken by SED on January 5, 2021.

GO 165 defines a patrol inspection as a “simple visual inspection” meant to identify “obvious” structural problems and hazards (e.g., leaning poles, loose crossarms, etc.) that may be carried out during other company business. Liberty did not identify any issues during its 2013, 2015 and 2017 routine patrol inspections.⁷

GO 165 defines a detailed inspection as one where facilities are “carefully examined” to gather and record conditions of overhead facilities. SED reviewed Liberty’s December 2016 and May 2020 distribution facilities inspection records. In May 2020, Liberty identified [REDACTED] on Pole #40288 at the incident location. Liberty identified [REDACTED] of Pole #40288 and assigned it to [REDACTED].⁸

C. Liberty’s Infrastructure

The incident conductors were size #4 ACSR 7/1 wire.^{9, 10} The conductor has a rated ampacity of 140 Amps at standard operating conditions.

The subject conductors spanned between Poles #40288 and #266731, which are approximately [REDACTED] feet apart. Pole #40288 is approximately [REDACTED] feet tall, and Pole #266731 is approximately [REDACTED] feet tall. The conductor sag for each subject conductor at the time of the incident is unknown. During the incident, the conductors for Pole #266731 were mounted to the pole in a triangular configuration at a height of approximately [REDACTED] feet at the cross arm and a height of [REDACTED] feet for the center phase on the pole top.¹¹ Conductor attachment heights for Pole #40288 were not available; however, they were arranged in a similar triangular configuration as Pole #266731. The minimum radial clearance from conductor to conductor at the time of the incident is also unknown.¹² Liberty provided its Overhead Distribution Conductor Stringing Guide, which provides tables containing the sagging data necessary to string overhead distribution conductors. SED identified that the tables contained within this guide do not include sagging tables for #4 ACSR conductors, which were the conductors installed and operating during the time of the incident.¹³ None of the documents provided demonstrated that Liberty maintained design standards for the #4 ACSR conductors

⁷ Data Request Response #1 for Question 10, CONFIDENTIAL-Liberty Response to SED Data Request Number SED-001-Mountain View Fire pg. 74-76, 03/15/2021.

⁸ Data Request Response #1 for Question 9, CONFIDENTIAL-Liberty Response to SED Data Request Number SED-001-Mountain View Fire pg. 10-11 and Question 30, CONFIDENTIAL-Liberty Response to SED Data Request Number SED-001-Mountain View Fire pg. 2035, 03/15/2021.

⁹ ACSR stands for Aluminum Conductor Steel Reinforced and is a conductor with a steel reinforced core wrapped with aluminum conductors.

¹⁰ Data Request Response #4 for Question 9, Liberty CalPeco's Response to DR SED-004-Mountain View Fire pg. 4, 10/23/2025.

¹¹ Data Request Response #4 for Question 3, LIB002225-LIB002304 pg. 43, 10/23/2025.

¹² Data Request Response #2 for Question 5, Liberty's Response to SED-002 12-3-21 pg. 4, 12/03/2021.

¹³ Data Request Response #4 for Question 2, LIB002234-LIB002253, 10/23/2025.

that were installed and in service during the time of the incident. Therefore, SED finds Liberty in violation of GO 95, Rule 31.1 for failing to maintain accurate design standards for equipment that is actively being operated in its system.

According to Liberty's data measured at Recloser 1261 R1¹⁴, the A, B, and C phases of the Topaz 1261 circuit at the time of the incident were loaded at [REDACTED], and [REDACTED] Amps respectively.

Liberty identified no abnormal configurations on the Topaz 1261 circuit within 24 hours prior to the incident start time.^{15,16}

The incident location is approximately 5,420 feet above sea level placing it in a heavy loading district. GO 95 Rule 43 requires that a conductor in a heavy loading district be able to withstand an ice layer of 0.5-inch radial thickness in a wind pressure of 6 pounds per square foot. At the time of the incident, there was no evidence of an ice layer on the conductors.¹⁷

SED requested pole loading calculations for Liberty's Poles #40288 and #266731. Liberty stated it did not have pole loading calculations for the incident poles performed prior to the incident. However, Liberty did have one pole loading calculation performed by a telecommunications provider from June 29, 2017 for Pole #266731.¹⁸ SED's review of the pole loading calculations identified the telecommunications provider had used incorrect parameters for the electrical conductors on the incident span. The communication provider used #4 ACSR HF, which has specifications equivalent to #4 ACSR 6/1, instead of using the correct #4 ACSR 7/1 in its pole loading calculations.^{19, 20}

¹⁴ Data Request Response #1 Supplemental for Question 23, CONFIDENTIAL-Liberty Supplemental Response to SED Data Request Number SED-001-Mountain View Fire LIB002058-LIB002155 pg. 57, 03/29/2021.

¹⁵ Data Request Response #1 for Question 42, CONFIDENTIAL-Liberty Response to SED Data Request Number SED-001-Mountain View Fire pg. 1834, 03/15/2021.

¹⁶ An abnormal configuration occurs when additional customers are temporarily added to a circuit. In addition, an abnormal configuration can occur when a loop exists on a circuit and electricity is sourced from a different section of the same circuit to feed that loop from a different location.

¹⁷ Based on historic data from the TPZ1261-Eastside Lane weather station, the lowest temperature in a 24-hour period prior to the incident occurred on November 17, 2020, at 0100 hours. The temperature was 48.0 degrees Fahrenheit, with a relative humidity of 31%. There was no precipitation recorded. Under these conditions, the ambient temperature did not drop to the frost point.

¹⁸ NOV Response at 6; Data Request Response #4 for Question 3, 10/23/2025 and Data Request Response #5 for Question 1, 6/5/2026.

¹⁹ NOV Response at 6; Data Request Response #4 for Question 3, LIB002225-LIB002304 pg. 43, 10/23/2025.

²⁰ NOV Response at 6; Wire specifications per Priority Wire (www.prioritywire.com/specs/ACSR.pdf); Data Request Response #4 for Question 3, LIB002267, 10/23/2025, shows the specifications for #4 ACSR HF have a cable weight of 0.057 lbs/ft and a cable diameter of 0.25 inches. Data Request Response #1 for Question 5, LIB000001, 3/15/2021, shows the specifications for #4 ACSR 6/1 also have a cable weight

#4 ACSR 7/1 has one additional aluminum wire compared to #4 ACSR 6/1 making it a larger and heavier wire overall.²¹ Performing a pole loading calculation using specifications for smaller and lighter conductors than those that are in operation creates inaccurate results that underestimate the actual stresses, loading, and resulting safety factors on a pole. Liberty is the primary owner of the pole and has the responsibility to ensure material changes to the pole and to maintain the facilities for their intended use in a condition that enables safe service. Liberty provided no evidence of identifying or fixing this mistake as it was the only relevant pole loading calculation in their possession for the incident poles prior to the incident.²² Liberty's failure to ensure that its pole loading calculations in its possession properly represented the facilities for their intended use is a violation of GO 95 Rule 31.1 because Liberty failed to verify that pole loading calculation results in its possession were accurate.

D. Liberty Equipment Operations and Timing

Recloser #1261 R2 is the closest upstream protective device to the incident location. Recloser 1261 R2 is programmed to pick up on phase-to-phase fault currents beginning at [REDACTED] amps and phase-to-ground fault currents at [REDACTED] amps.²³ Liberty provided the timed data for the Supervisory Control and Data Acquisition (SCADA) devices upstream of the incident location to the substation circuit breaker.²⁴ SED's review of the data identified there were conditions on the incident circuit that required protection equipment to operate immediately prior to the initial alarm to emergency services. The SCADA data shows that on November 17, 2020, Liberty's Recloser #1261 R2 detected a phase-to-phase fault current of approximately [REDACTED] amps involving the B and C phases at 1153 hours and 36 seconds. Recloser #1261 R2 attempted to reclose three times before locking out at 1154 hours and 48 seconds due to a phase-to-ground fault on the C phase of approximately [REDACTED] amps.²⁵ Figure 4, below, shows a circuit map of the equipment and incident area.

of 0.057 lbs/ft and a cable diameter of 0.25 inches. This is consistent with the #4 ACSR HF used in the June 29, 2017 pole loading calculation.

²¹ Data Request Response #1 for Question 5, LIB000001, 3/15/2021, shows the specifications for #4 ACSR 7/1 have a cable weight of 0.067 lbs/ft and a cable diameter of 0.257 inches.

²² Data Request Response #5 for Question 1, 6/5/2026.

²³ Data Request Response #1 for Question 23, LIB001857 pg. 1857, 3/15/2021.

²⁴ SCADA is software that allows for local and remote data collection in real-time and for defined time periods. SCADA is provided in protection devices along circuits to alert personnel as soon as there is a fault or issue on the line. SCADA allows the fault or issue to be isolated quickly and helps mitigate downtime.

²⁵ Data Request Response #1 for Question 18, CONFIDENTIAL-Liberty Response to SED Data Request Number SED-001-Mountain View Fire pg. 1835 and 1848-1849, 03/15/2021.

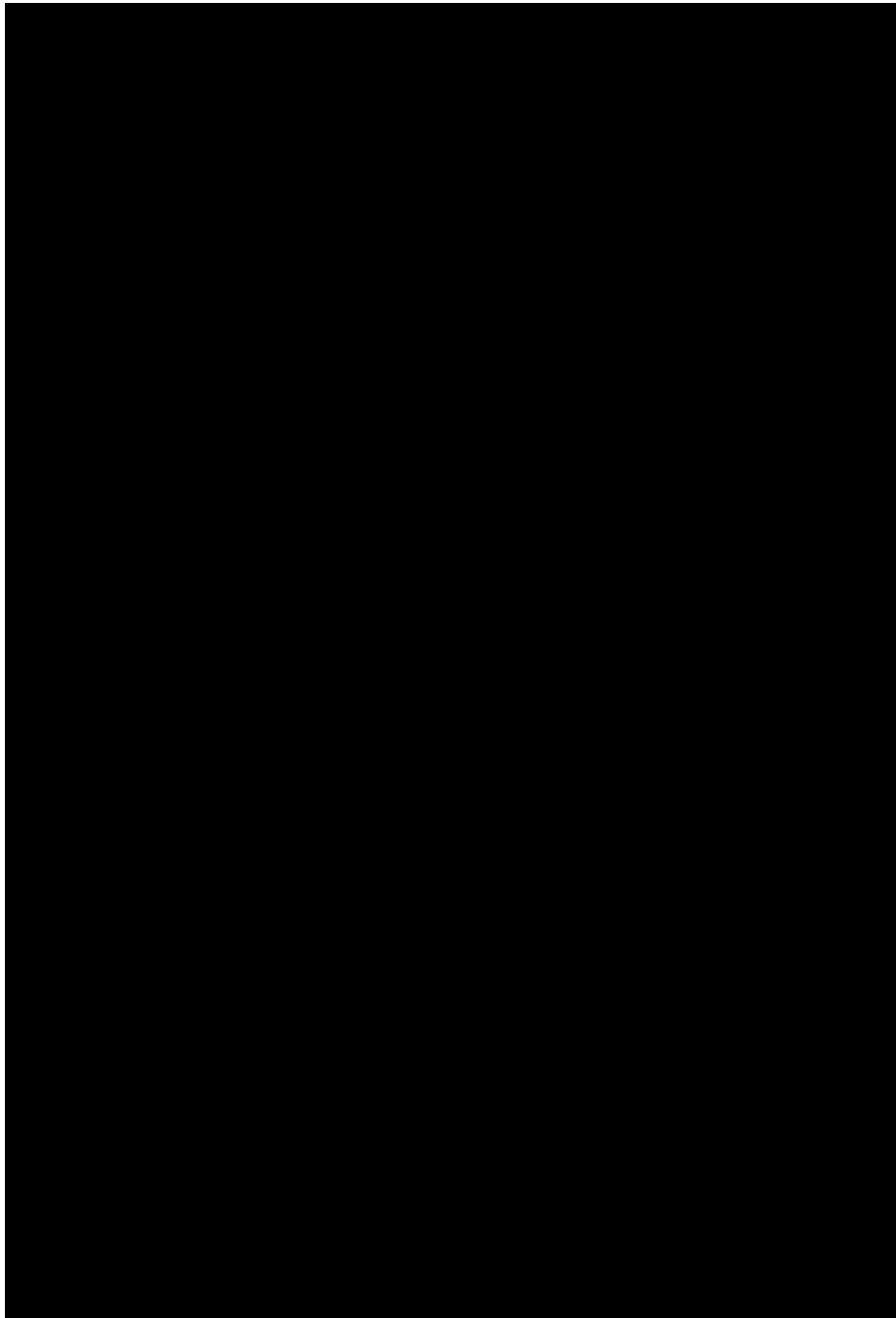


Figure 4: Topaz 1261 Circuit Map²⁶

²⁶ Data Request Response #3 for Question 14, CONFIDENTIAL-Liberty Response to SED Data Request Number SED-003-Mountain View Fire [LIB002187-LIB002225] pg. 38, 08/01/2022.

Liberty established the following timeline of specific equipment operations and actions of its employees at or near the incident location during the 12 hours preceding the fire until the date BLM declared the fire fully contained^{27, 28, 29}:

Date	Time	Event
1) November 17, 2020	1154 hours	Liberty line Recloser #1261 R2 opened due to an electrical fault and sent a SCADA alarm to Liberty; this resulted in an outage that affected █ customers.
2) November 17, 2020	1203 hours	Antelope Valley Fire Department received an alarm for the fire.
3) November 17, 2020	1205 hours	Antelope Valley Fire Department arrived at the incident location.
4) November 17, 2020	1209 hours	State and Federal fire agencies began responding to the fire. BLM assumed incident command.
5) November 17, 2020	1215 hours	Liberty deenergized the Topaz. 1261 line interrupting power to █ customers
6) November 18, 2020	1818 hours	Liberty energized a portion of the Topaz 1261 line restoring power to █ customers.
7) November 20, 2020	1431 hours	Liberty restored power to █ customers.
8) November 21, 2020	1825 hours	Liberty restored power to █ customers.
9) November 22, 2020	1630 hours	Liberty restored power to all customers that could be restored.
10) December 11, 2020		BLM declared the Mountain View Fire fully contained.

²⁷ Data Request Response #1 for Question 14, CONFIDENTIAL-Liberty Response to SED Data Request Number SED-001-Mountain View Fire pg. 1836-1855 03/15/2021.

²⁸ Data Request Response #1 Supplemental for Question 14, CONFIDENTIAL-Liberty Supplemental Response to SED Data Request Number SED-001-Mountain View Fire LIB002139-LIB002153 pg. 57, 03/29/2021.

²⁹ CPUC Site Visit Observation Report pg. 2 01/05/2021.

E. Public Safety Power Shut-off (PSPS)

On November 17, 2020, Liberty did not institute a PSPS de-energization event. In Liberty's 2020 Wildfire Mitigation Plan (WMP), Liberty required the Energy Release Component (ERC) to be greater than the 92nd percentile to advance on its decision tree, as shown in Figure 5, to proceed with a PSPS event. Liberty calculated the ERC to be 60.5 at 0000 Hours, 60.5 at 0600 hours, and 48.9 at 1200 hours on November 17, 2020.³⁰ Without the ERC exceeding the 92nd percentile, Liberty's PSPS plan disregarded any other conditions present to initiate a PSPS event. There were no Red Flag warnings issued on November 17, 2020.

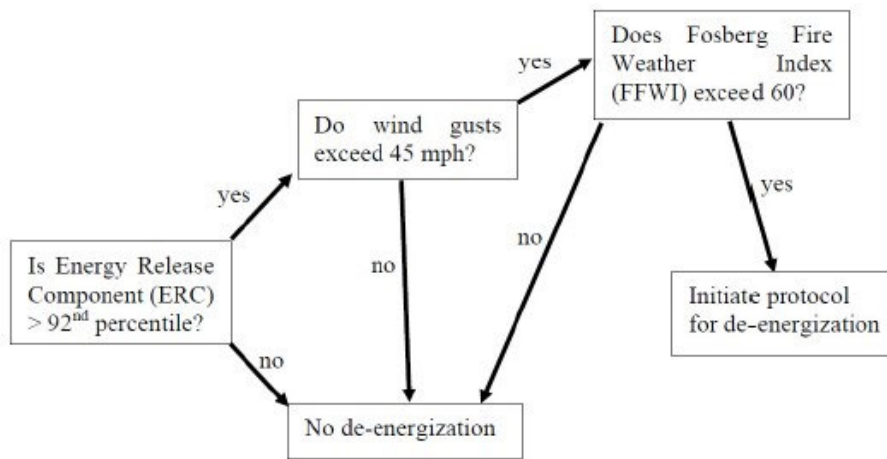


Figure 5: Topaz Circuit PSPS Decision Tree³¹

F. Topaz 1261 Circuit's Known Exposure to High Wind Conditions

On August 20, 2019, Liberty published a commissioned study, *De-energization Thresholds for Prevention of Catastrophic Wildfires*. The study analyzed historical weather data to assist in the establishment of de-energization thresholds. The Topaz Circuit was identified as being subject to higher winds compared to the rest of Liberty's service territory.³² The report suggested that, because of the higher than average winds, Liberty establish a higher threshold for de-energization for the Topaz Circuit than the rest of the system.³³ GO 95, Table 2, Footnote (zz) applies to wire-to-wire clearances and states the following: "[i]n areas that are subjected to high winds, a utility may need to take extra measures to maintain all required separations. Measures may include but are not limited to, spacer bars and increased pin spacing." Liberty was aware that the

³⁰ Liberty-03E: Prudence of Operations pg. 40, footnote 49, served December 9, 2025 in A.25-06-017 (Liberty-03E).

³¹ Liberty Revised 2020 Wildfire Mitigation Plan pg. 111 and Liberty-03E at pg. 39.

³² Liberty-03E at pg. 39.

³³ Liberty-03E at pg. 39.

Topaz Circuit was consistently subject to higher winds, but Liberty failed to provide evidence that it utilized any additional measures, construction practices or procedures to reinforce its system based on these known high wind conditions. Liberty relied solely on spacing already present in legacy equipment, and performed no independent analysis or assessment of the actual conditions at the Topaz Circuit to determine if the high winds warranted additional construction methods such as increased line tension or spacers. Therefore, SED finds Liberty in violation of GO 95, Rule 31.1 for failing to design, construct, and maintain its circuit for the known local conditions.

IV. Fire Authority Investigation

The response to the Mountain View Fire was a multiple agency operation that included local, state, and federal agencies. BLM assumed Incident Command and was the agency-in-charge. CAL FIRE investigated the fire and prepared an investigation report on behalf of BLM.

Witness statements indicated that the power line was emitting electrical arcs while downed.³⁴ CAL FIRE investigator identified no other potential ignition sources at the scene, nor were there any reports of lightning strikes at the time of the incident.³⁵ The investigator identified birdcaging and burn marks on the wire down. They also identified visible char and melting on one of the aerial conductors.³⁶ The investigator determined the fire was most likely caused by the downed power line.³⁷



Figure 6: Conductor burned and visible bird-caging.³⁸

³⁴ FOIA Response 1, 11-[b6_b7C] Witness Statement (003)_Redacted pg. 1, 05/12/2025.

³⁵ BLM FOIA Request 1, CAL FIRE Investigation Report 20CAOVD030860, pg. 21.

³⁶ BLM FOIA Request 1, CAL FIRE Investigation Report 20CAOVD030860, pg. 19 - 20.

³⁷ FOIA Response 1, 00-MOUNTAIN VIEW LE80 20CAOVD030860_Redacted pg. 21, 05/12/2025.

³⁸ FOIA Response 1, 03-[b6-b7C] MOUNTAIN_VIEW_PHOTOS_Untitled_Redacted pg. 10, 05/12/2025.



Figure 7: Broken conductor with scorched end and signs of beading³⁹

V. Liberty Independent Investigation

Liberty conducted a separate peer-reviewed investigation into the Mountain View Fire using a third-party investigator. The independent investigator acknowledged the broken wire was energized for up to 15 seconds while contacting the ground.⁴⁰ Additionally, the investigator agreed with the evidence indicating a wire-to-wire contact on the incident span between the incident poles and that multiple wires were melted and fractured during the wire-to-wire contact.⁴¹ Liberty concedes that the evidence is “consistent with the possibility that electrical facilities caused the Mountain View Fire.”⁴² Liberty did not provide any reasonable or probable alternative sources to the fire’s ignition. The electrical conductor, as evidenced by its birdcaging and burn marks, remained to be the most probable cause of the fire.

VI. Conclusion

SED’s investigation finds Liberty in violation of three instances of GO 95, Rule 31.1, as identified above.

Rule 31.1 requires utilities to design, construct, and maintain their systems to higher standards beyond the minimum requirements of GO 95 Table 2 if required for safe operation due to local conditions, such as excessive wind. The BLM report, Liberty’s own peer-reviewed investigation, and SED’s analysis of all available evidence determined that there was a wire-to-wire contact of Liberty’s conductors during the incident. As evidenced by Liberty’s August 20, 2019, study, Liberty knew that the Topaz

³⁹ FOIA Response 1, 03-[b6-b7C] MOUNTAIN_VIEW_PHOTOS_Untitled_Redacted pg. 7, 05/12/2025.

⁴⁰ Data Request Response #4 to Question 5, LIB002225-LIB002304 pg. 69, 10/23/2025.

⁴¹ Data Request Response #4 to Question 5, LIB002225-LIB002304 pg. 74, 10/23/2025.

⁴² Liberty Utilities (CalPeco Electric) LLC’s (U 933-E) Opening Brief, filed March 13, 2026 in A.25-06-017, at 8.

circuit was in a high wind area. GO 95, Table 2, Footnote (zz) applies to wire-to-wire clearances and states the following: “[i]n areas that are subjected to high winds, a utility may need to take extra measures to maintain all required separations. Measures may include but are not limited to, spacer bars and increased pin spacing.”

Liberty failed to provide evidence that it utilized any additional construction practices to reinforce its system based on these known high wind conditions. In addition, Liberty does not have procedures for the use of line spacers in distribution circuits.⁴³ Liberty relied on spacing already present in legacy equipment, and did not implement its own analysis or assessment to determine if additional mitigation measures were necessary, as required by GO 95 Rule 31.1.

Rule 31.1 requires utilities to design their system to enable the furnishing of safe, proper, and adequate service. The conductors installed during the time of the incident were #4 ACSR 7/1 conductors. SED’s review of Liberty’s design standards, which included Liberty’s Overhead Distribution Conductor Stringing Guide, identified that the tables contained within this guide do not include sagging tables for #4 ACSR conductors. Liberty’s failure to maintain design standards for equipment that is actively being operated in its system constitutes a violation of GO 95, Rule 31.1.

Rule 31.1 requires utilities to design, construct, and maintain their facilities in accordance with accepted good practice for the intended use. Liberty maintained a pole loading calculation prepared by a communications provider that relied upon incorrect electrical conductor sizes. Liberty provided no evidence of identifying or fixing this mistake, and this incorrect calculation was the only pole loading calculation in its possession prior to the incident relating to the incident poles. As the primary pole owner, Liberty has the responsibility to verify pole loading calculations are accurate and maintain the pole in a condition that enables safe service. Liberty failed to ensure that the communication company used the proper specifications for Liberty’s facilities, and Liberty failed to maintain accurate pole loading calculations.

If SED becomes aware of additional information that could modify SED’s findings in this Incident Investigation Report, SED may re-open the investigation and may modify this report or take further actions as appropriate.

⁴³ Data Request Response #4 to Question 6, 10/23/2025.