



**ANNUAL GENERAL ORDER 166 REPORT OF
LIBERTY UTILITIES LLC
(Public)**

Compliance Period: January 1, 2025 – December 31, 2025

Submitted by:
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Dated: April 30, 2026

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Introduction

Pursuant to General Order 166 (“G.O. 166”), Standard 11, Liberty Utilities LLC (“Liberty”) hereby submits this report on its compliance with each of the G.O. 166 standards for the January 1, 2025 to December 31, 2025 compliance period.

Liberty provides retail electric service to the public in the Lake Tahoe area of California. Liberty serves about 50,000 customers located in portions of Placer, El Dorado, Nevada, Sierra, Plumas, Mono, and Alpine Counties. Although its service territory encompasses western portions of the Lake Tahoe Basin, ranging from Portola in the north to Markleeville and Walker in the south, approximately 80 percent of Liberty’s customers are in the Lake Tahoe Basin. The service territory terrain is mountainous, with elevations ranging from 9,050 feet in Squaw Valley to just under 5,000 feet at Portola. Most of Liberty’s customers are located at elevations higher than 6,000 feet.

Liberty’s electric service area is divided into two districts for electric operations, with individual service operations for each district. Liberty’s South Lake Tahoe Operations, located at 933 Eloise Avenue in South Lake Tahoe, California, serves the first district, primarily comprised of the South Tahoe service area, including parts of El Dorado, Mono, and Alpine Counties. Liberty’s North Lake Tahoe District Operations, located at 701 National Avenue in Tahoe Vista, California, serves the second district, primarily comprised of the North Tahoe service area, including parts of Placer, Nevada, Sierra, and Plumas Counties. The two service areas work as independent control areas for distribution switching. The 120 kV systems out of Truckee and

Verdi, California serve as the primary transmission source for North Tahoe, and the 120 kV systems out of the Carson Valley in Nevada serve as the primary transmission source for South Tahoe. There is very little distribution interconnection between the two service areas. Because of the unique independent configuration, the service areas operate as individual districts during emergencies.

Correspondence or communications regarding this report should be addressed to:

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Standard 1: Emergency Response Plan

Liberty updated and implemented its Corporate Emergency Management Plan ("CEMP"), which addresses each of the items specified in Standard 1. A copy of the plan is submitted with this document as Tab 1. Additionally, Liberty provides its Wildfire Mitigation Plan ("WMP") to supplement elements of the CEMP, as Tab 2.

Standard 2: Mutual Assistance Agreements

Liberty has a Mutual Assistance Agreement with NV Energy, is party to the Western Energy Institute Mutual Assistance Agreement (Tab 3), and has entered into the California Utilities Emergency Association ("CUEA") Mutual Assistance Agreement for Electric Services and the CUEA Call Center Mutual Assistance Agreement, as requirements for participation in these agreements are predicated on membership in CUEA (Tab 4).

Standard 3: Emergency Training and Exercises

Liberty conducted an internal review of its emergency plan and procedures through a Winter Storm Tabletop Exercise meeting held at the Tahoe Vista office location involving all

operations personnel. The exercise included a simulation with the goal of improving operational effectiveness during a major storm event. This meeting encompassed equipment, training, and an overview of the CEMP.

Standard 4: Communications Strategy

- A. Liberty's strategy for communicating with the media and customers is contained in the Emergency Plan Additional Elements section of the CEMP.
- B. Liberty's strategy for communicating with government officials and departments is contained in the Emergency Plan Additional Elements section of the CEMP.
- C. The electric distribution system that serves Liberty customers is not connected to any California Independent System Operator (CAISO)-controlled or Transmission Owner-operated electric grid. CAISO and California transmission emergencies do not directly affect Liberty's California customers because the primary electricity generation and transmission are served from Nevada and a separate northwest operating grid. Liberty's service territory is located within NV Energy's Balancing Area. NV Energy's Transmission and Balancing Operations' Center is continually in contact with the CAISO and other Transmission Owners as part of the North America Electric Reliability Council.

Standard 5: Activation Standard

For the period January 1, 2025 through December 31, 2025, Liberty reported zero Major Outages, defined as when at least 50 percent (*i.e.*, 24,000) of Liberty's serviceable customers experience a simultaneous, non-momentary interruption of service.

Standard 6: Initial Notification Standard

For the period January 1, 2025 through December 31, 2025, Liberty reported zero Major Outages, as listed in Standard 5 above.

Standard 7: Mutual Assistance Evaluation Standard

For the period January 1, 2025 through December 31, 2025, this standard does not apply because Liberty reported zero Major Outages, as listed in Standard 5 above.

Standard 8: Major Outage and Restoration Estimate Communication Standard

During the period January 1, 2025 through December 31, 2025, Liberty did not utilize its established email notification system that communicates details of any event with local county and city personnel, including fire department, law enforcement, and emergency response personnel. This correspondence would include a report on the cause of the event, the areas affected, and the estimated time of restoration. A final communication would be sent when all systems are fully restored.

In addition, if an event were to occur that involved the circuits in NV Energy's service area, Liberty team members would be in constant contact with NV Energy system control and dispatch personnel to keep apprised of system restoration progress.

Standard 9: Personnel Redeployment Planning Standard

Liberty outlines the personnel and resource redeployment process in the Emergency Activation and Supplemental & Contingency Resources sections of the CEMP. As the development of Regional Emergency Coordination Plans continues, the training and deployment of non-trade emergency personnel will be addressed in the planning process.

Standard 10: Annual Pre-Event Coordination Standard

Liberty is an active participant and supporter of state and local emergency response efforts, including Local Emergency Planning Committees ("LEPC"), the California Utility Emergency Association ("CUEA"), the Sierra Front Wildfire Cooperators, and local county offices of emergency services. As part of compliance with G.O. 166, Liberty conducts emergency

preparations meetings with state, county, and local agencies and the transmission owner on a continual basis throughout the year. As part of such activities, Liberty establishes and confirms contacts and communication channels, plans the exchange of emergency planning and response information, and participates in emergency exercises or training. Documentation of the meetings is provided as Appendix B to the CEMP.

Additionally, Liberty regularly updates and exchanges contact information with state, county, and local agencies when attending exercises or events hosted by these entities.

Standard 11: Annual Report

As part of its requirements pursuant to G.O. 166, Liberty presents this report for the 12-month compliance period December 31, 2025. Modifications to the emergency plan are presented in the section titled Standard 1: Emergency Response Plan.

Further, Liberty provided updates to the number of repair and maintenance personnel in each personnel classification in each territory (and total throughout the company) in Tab 5 of this report.

Standard 12: Restoration Performance Benchmark for a Measured Event

Liberty has fewer than 150,000 electric customers and is exempt from application of this standard.

Standard 13: Call Center Benchmark for a Measured Event

Liberty has fewer than 150,000 electric customers and is exempt from application of this standard.

Standard 14: Plan Development Coordination and Public Meetings

Liberty is an active participant and supporter of state and local emergency response efforts, including Local Emergency Planning Committees (LEPC), the California Utility Emergency

Association (CUEA), the Sierra Front Wildfire Cooperators, and local county offices of emergency services. As part of compliance with G.O. 166, Liberty has instituted procedures to conduct annual emergency preparations meetings with state, county, and local agencies and the transmission owner. As part of such activities, Liberty will establish and confirm contacts and communication channels, plan the exchange of emergency planning and response information, and participate in emergency exercises or training.

Multiple meetings were held and attended with state, county, and local agencies, as well as the transmission owner for this purpose. Documentation of the meetings is provided in Appendix B to the CEMP.

Respectfully submitted,

/s/ Elly O'Doherty

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