

February 17, 2026

Patrick Doherty  
Program Manager | Compliance Assurance Division  
Office of Energy Infrastructure Safety  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

RE: Energy Safety NON ID: CAD\_PGE\_IAG\_20250730\_1537  
Notice of Violation: Government Code § 15475.1 and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2)

Dear Mr. Doherty:

This letter is in response to the above referenced Notice of Nonperformance (NON) dated December 22, 2025. The NON arises from the Office of Energy Infrastructure Safety's (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2024 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Fourth Quarter (Q4) Quarterly Data Report (QDR).

Energy Safety based its compliance assessment on the following statute and code sections:

**California Government Code Section 15475.1**, states:

- (a) *The office may determine that a regulated entity is not in compliance with any matter under the authority of the office. If necessary, the office may undertake an investigation into whether the regulated entity is noncompliant with its duties and responsibilities or has otherwise committed violations of any laws, regulations, or guidelines within the authority of the office.*
- (b) *The office's primary objective is to ensure that regulated entities are reducing wildfire risk and complying with energy infrastructure safety measures as required by law.*

**California Code of Regulations, Title 14, Section 29302(b)(2), "Investigations, Notices of Defect and Violation, and Referral to the Commission"** states in part:

*"The Director may designate a compliance officer to consider the findings of any investigation. The compliance officer may issue any of the following:*

...

*(2) Notice of violation, identifying noncompliance with an approved Wildfire Mitigation Plan or any law, regulation, or guideline within the authority of the Office."*

## **Violation**

The NON was identified from a July 30, 2025 inspection by Energy Safety in the vicinity of the city of Arroyo Grande, CA, in High Fire Threat District (HFTD) Tier 2 of PG&E's Q4 QDR report for WMP Initiative 8.1.2.10.1 – Down Conductor Detection Devices:

*Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.1 – Down Conductor Detection Devices, PG&E failed to install a DCD device on pole ID 121426400, Grid Hardening ID {02896B1A-0763-4C6D-956E-B1F4B47D7741} at Lopez Dr, Arroyo Grande, CA, 93420, USA, 35.175662, -120.525458. In the 2024 Q4 Quarterly Data Report submission, PG&E reported that work on WMP initiative 8.1.2.10.1 – Down Conductor Detection Devices was completed at this location.*

## **Response**

PG&E disagrees with the findings of this NON as the activity to add Down Conductor Detection (DCD) to Line Recloser V46 was indeed completed as indicated in 2024 Q4 Quarterly Data Report submission. Please see file “PGE\_NON\_CAD\_PGE\_IAG\_20250730\_1537\_20260217\_Atch01\_CONF.pdf” of photo evidence of the DCD deployed at this site's original location described in the Q4 QDR report.

However, after being made DCD capable in 2024, in 2025 a separate activity relocated Line Recloser V46 approximately 1.5 miles northeast on the same line on reliability project (PM# 35595470). The recloser was relocated as part of a reliability enhancement to better optimize the location of this equipment when responding to outages. The relocated installation remains equipped with equivalent DCD capabilities as the original location. This relocation activity occurred on 5/16/25 after the original location was reported complete. The old location was left with a manual switch only which was documented in the site photos taken as part of this notice.

See files “PGE\_NON\_CAD\_PGE\_IAG\_20250730\_1537\_20260217\_Atch02\_CONF.pdf” & “PGE\_NON\_CAD\_PGE\_IAG\_20250730\_1537\_20260217\_Atch03\_CONF.pdf” for the completed relocation information of the DCD.

The current location of Line Recloser V46 can be observed at the following location: (35.1835, -120.5024). Please see files below that clearly show that LR V40 was DCD capable on the date it was constructed.

- “PGE\_NON\_CAD\_PGE\_IAG\_20250730\_1537\_20260217\_Atch04.pptx”

Finally, the upstream sections previously protected by DCD remain protected by the next upstream DCD capable device which is Line Recloser V40 (35.2197, -120.5968).

Included Attachments:

File Name	File Description
PGE_NON_CAD_PGE_IAG_20250730_1537_20260217_Atch01_CONF.pdf	PM 35595470 Relocation Job Pre-Construction / Photo Evidence of original DCD location
PGE_NON_CAD_PGE_IAG_20250730_1537_20260217_Atch02_CONF.pdf	PM 35595470 Completed Circuit Map Change Sheet
PGE_NON_CAD_PGE_IAG_20250730_1537_20260217_Atch03_CONF.pdf	PM 35595470 Completed Circuit Drawing
PGE_NON_CAD_PGE_IAG_20250730_1537_20260217_Atch04.pptx	ROE / Clearly show that the LR V40 was DCD capable on the date it was constructed

Please do not hesitate to contact [WSComplianceMailbox@pge.com](mailto:WSComplianceMailbox@pge.com) if you have any questions regarding this matter.

Sincerely,

Daniel Kushner, PhD  
Senior Director, Electric Risk & Compliance

cc: Samuel Isaiah, Senior Utilities Engineer Specialist, Energy Safety  
Yana Loginova, Program Manager, Energy Safety  
Shannon Greene, Program Manager, Energy Safety  
Romeo Marroquin Ajcac, Field Inspector, Energy Safety