

June 18, 2026

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

RE: Energy Safety NON ID: CAD_PGE_IAG_20250731_0946
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, regarding the Office of Energy Infrastructure Safety (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 31, 2025 inspection by Energy Safety in the vicinity of the city of San Luis Obispo, CA, in High Fire Threat District (HFTD) Tier 2 of PG&E's Q4 QDR report for WMP Initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses, Utility Initiative GH-10:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses, PG&E failed to complete work on non-expulsion fuse replacement pole ID 120193426, Grid Hardening ID 31658269 at 624-898 W Ormonde Rd, San Luis Obispo, CA, 93401, USA, 35.180815, -120.613431

Initial Response

PG&E respectfully disagrees with the finding that PG&E did not properly execute work to completion on the GH-10 initiative at this location. Grid Hardening ID 31658269 removed non-exempt equipment with exempt equipment, specifically the cutout was replaced with a Part 63H type, which only holds exempt SMU20 type fuses. The exempt SMU20 fuses are shown hanging on the pole's steps and conform to PG&E guidance document 15225 (1.C.1) for care and handling of Type E Power fuses. The fuses are kept on site, ready for service, when and if needed to support circuit configuration changes.

OH: Cutouts and Fuses

Cutouts, Fuses, and Disconnects for Overhead Distribution Lines

Care and Handling and Installation of Type E Power Fuses

This applies to all sizes of Type E Power fuses from Table 9

1. Power fuses are manufactured for outdoor use; however, proper care and storage of the fuse is critical.
 - A. **ALWAYS STORE** fuses in as dry an environment as possible.
 - B. **NEVER LEAVE** fuses in standing water.
 - C. **DO NOT LEAVE** fuses hanging in the open position.
 1. IF fuse must be left open for an extended period, **THEN HANG it on** pole step.

Image 1: Screen capture of PG&E document 15225 with guidance for Type E power fuse placement.

Fuse 5185, which was changed on the non-exempt replacement for job 31658269, functions as a Normally Open (N.O.) tie between the Oceano 1104 and San Luis Obispo 1104 circuits. At this location, E type fuses are hung on the pole step, and the bypass solid blades (SBs) remain open as part of the standard, planned setup. If either the bypass or the fuse was closed without opening another point on either circuit, this would parallel the two circuits and expose the system to increased fault duties and higher potential reliability impacts.

However, this normally open point offers operational flexibility. In the event of an outage on either circuit, it can be closed to help restore service. Similarly, it can be closed to minimize customer disruptions during other planned work. The presence of both a solid blade and a fuse at this location enables the system to adapt more effectively to abnormal conditions that might arise.

This project was completed successfully because there is no longer an expulsion type fuse at the location in the event that the fuse needs to be closed to support an abnormal configuration. The location now has the exempt fuses ready.

Supplemental Response

PG&E respectfully disagrees with Energy Safety's finding and maintains the location identified in NON_CAD_PGE_IAG_20250731_0946, Notice of Non-Performance (NON) is compliant with the requirements of GH-10.

PG&E's Non-Exempt Expulsion Fuse program focuses on reducing wildfire ignition risk by replacing and/or removing non-exempt fuses. In this instance, all non-exempt fuses have been removed from the structure. The removal of the non-exempt fuses meets the completion requirements of this WMP initiative.

The additional cutouts present on this structure were installed to provide a bypass for the fuses. This does not create additional safety risk and allows operational flexibility and protection coordination.

Field resources must follow Engineering Standard 015225 "Cutouts, Fuses, and Disconnects for Overhead Distribution" which contains the fuse application decision tree on page 20 to guide resources in the installation of fuses. The test results shown below in Figure 1 confirms PG&E's storage practice of fuses on the pole steps is a safe and acceptable Best Management Practice (BMP).

See attachment "*PGE_NON_CAD_PGE_IAG_20250731_0946_20260618_ATCH001_CONF.pdf*"

The storage practice of hanging fuses on pole steps is not a component of the GH-10 commitment. During a consultation with Energy Safety on March 4, 2026, PG&E voluntarily decided to remove the fuses from the pole steps to initiate a testing protocol to confirm that the fuses are not compromised by water ingress and therefore that storing them on pole steps is appropriate when desired. All fuses passed the electrical test (low voltage ~1V and 350A applied) with no signs of water ingress

Energy Safety NOV Number	Unique Fuse Number	Fuse Size	Electric Testing
CAD_PGE_IAG_20250731_0946	92580466-0048	50E	PASS
CAD_PGE_IAG_20250731_0946	92580466-0036	50E	PASS
CAD_PGE_IAG_20250731_0946	92590049-0110	50E	PASS

* Figure 1: ATS fuse testing results

Please see the photo evidence below for removal of CalFire Exempt fuses from the pole step for testing. Due to the concerns expressed by Energy Safety, at this time, PG&E will not be placing fuses for storage on the pole step of the subject pole (pole ID 120193426).



Please do not hesitate to contact 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