

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 ID: NOV_CAD_PGE_KSF_20250408_1027
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 Violation (NOV) dated July 24, 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.

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."*

Energy Safety's April 8, 2025, inspection identified the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.5 - Non-Exempt Expulsion Fuses, on pole ID 240580, Grid Hardening ID 31661057 at 14912-14918 Montalvo Rd, Saratoga, CA, 95070, USA, 37.250267919652664, -122.02786853287508, the inspector observed that exempt fuses were not attached to the cutouts.

Initial Response

PG&E respectfully disagrees with the Energy Safety finding in this Notice of Violation (NOV) from April 8, 2025.

PG&E replaced the non-exempt fuses with solid blade disconnects per EC Tag 126535166, Grid Hardening ID 31661057, at pole SAP ID 100553714. GIS records are shown in Image 1 as device 29225 SB.

The reason for the solid blades at this location with an empty cutout is that the fuse is essentially not needed as there has not been any outage history for up to five years as well as difficulty coordinating the protection scheme. The spare/alternate cutouts will remain available in the event there is a loading or configuration change to the circuit, but they are not necessary for the present design. Additionally, there already exists an upstream source-side fuse providing protection for this zone at pole SAP Equipment ID 100551366.

Doing so is in alignment with PG&E's standards. As described in PG&E's 2023-2025 WMP for target GH-10: "Occasionally, when replacing existing non-exempt fuses with exempt fuses, the exempt fuse will disrupt the protection scheme for that circuit. In these cases, PG&E will be deploying Solid Blade switches to support operational flexibility and protect coordination."¹

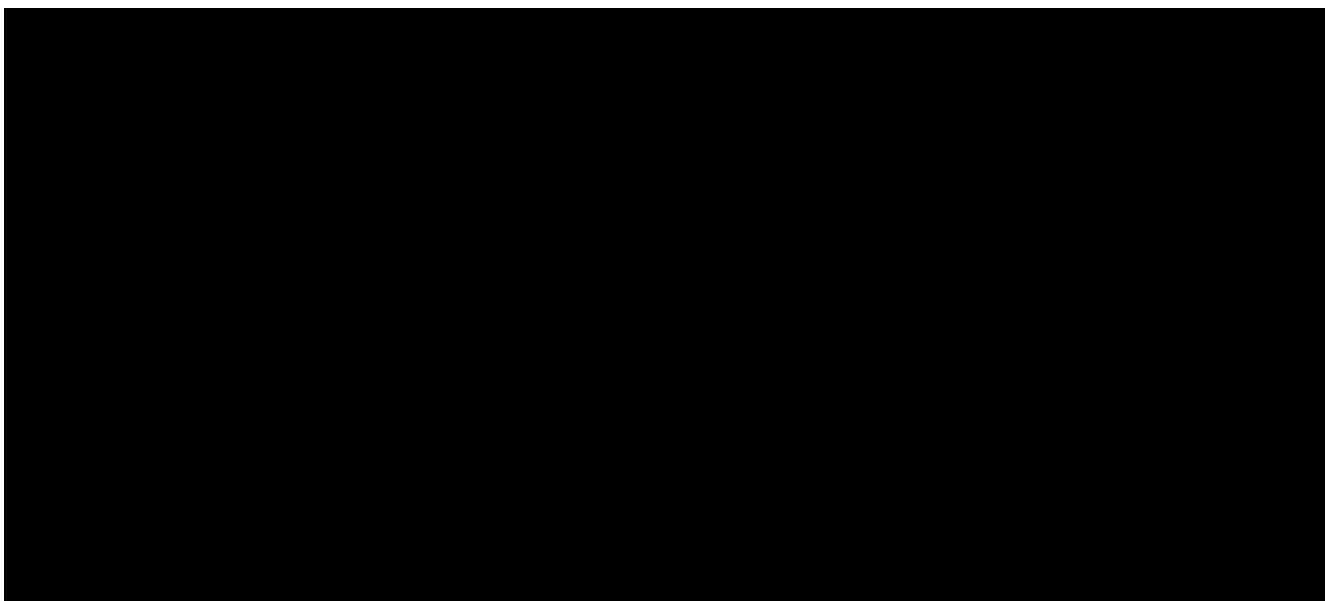


Image 1: Pole location in GIS system of record showing new solid blade configuration pole device 29225 SB.

¹ PG&E 2023-2025 WMP R7 (Feb. 13, 2025) at 465.

Supplemental Response

PG&E respectfully disagrees with Energy Safety's finding and maintains the location identified in NOV_CAD_PGE_KSF_20250408_1027, Notice of Violation (NOV) 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 confirm PG&E's storage practice of fuses on the pole steps is a safe and acceptable Best Management Practice (BMP).

See attachment "*PGE_NOV_CAD_PGE_KSF_20250408_1027_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_KSF_20250408_1027	92365473-0238	50E	PASS
CAD_PGE_KSF_20250408_1027	92365473-0241	50E	PASS
CAD_PGE_KSF_20250408_1027	92365473-0264	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 240580 labeled on NOV).



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