

July 17, 2026

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

RE: Energy Safety NODI_PAD_PGE_BKA_20251105_1239
Notice of Data Inaccuracy: Government Code §§ 15475.1(a) and 15475.2(a)(2), 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 Data Inaccuracy (NODI) dated June 17, 2026, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2025 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Second Quarter (Q2) 2025 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 Government Code Section 15475.2, states:

- (a) The office may issue a notice of defect or violation to direct the regulated entity to correct any defect or noncompliance with the approved wildfire mitigation plan or failure to comply with any laws, regulations, or guidelines within the authority of the office.*

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.”

On November 5, 2025, Energy Safety conducted an inspection of Pacific Gas and Electric Company’s WMP initiatives in the vicinity of the city of Cool, California. Energy Safety found the following data inaccuracies:

Data Inaccuracy 1. On Pole ID 121901742, Grid Hardening ID 35305310 at coordinates 38.8989112519005, -120.947950005085, the inspector observed that PG&E failed to adhere to data accuracy.

Response

PG&E understands Energy Safety’s concern to be that the field condition observed at Pole ID 121901742 appeared inconsistent with the completion status of the referenced grid hardening work. For clarity, PG&E had two adjacent project orders in this location. Plant Maintenance (PM) Order 35305310 was directly adjacent to PM 35305303. At the time Energy Safety conducted its inspection on November 5, 2025, the remaining overhead spans associated with PM 35305303 had not yet been reduced from three phases to two phases. As a result, a third phase remained in service, including the middle phase observed at Pole ID 121901742.

Following the Energy Safety inspection, the segment of PM 35305303 closest to the subject pole was completed, reducing the remaining overhead facilities from three phases to two phases and removing the remaining bare middle phase from the subject pole. PG&E provided work completion updates in the Q4 2025 QDR submitted to Energy Safety on February 1, 2026.

Consistent with PG&E's Quality Assurance (QA) process, the affected span was not considered QA complete and was not counted as complete work until the bare phase was removed and the final two-phase configuration was achieved. Therefore, the field condition observed during the inspection reflected ongoing work associated with the adjacent project and was not recorded by PG&E as a completed grid hardening treatment prior to completion of the associated scope of work.

As a result, PG&E respectfully disagrees that a data inaccuracy exists.

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:

Babak Kaviani, Field Inspector, Energy Safety
Samuel Isaiah, Senior Utilities Engineer Specialist, Energy Safety
Shannon Greene, Program & Project Supervisor, Energy Safety