

October 16, 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 ID: PAD_PGE_IAG_20260428_1456
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 September 16, 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 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 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.”

The NODI was identified during an April 28, 2026, inspection by Energy Safety in the vicinity of the city of Placerville, CA, a Tier 2 High Fire Threat District (HFTD) of PG&E’s Q4 QDR for WMP Initiative 8.1.2.1 – Cover Conductor Installation - Distribution, Utility Initiative GH-01:

Data Inaccuracy 1. On Structure ID 121554057, Grid Hardening ID 35549057 at coordinates 38.7238493580724, -120.76819807834, the inspector observed that PG&E failed to adhere to data accuracy.

Response

PG&E agrees with Energy Safety's field observation that covered conductor was not installed on the span between Pole ID 121845980 and Structure ID 121554057 associated with Grid Hardening ID 35549057. PG&E also agrees that covered conductor was installed on the adjacent span between Pole ID 120180688 and Pole ID 121845980, consistent with Energy Safety's field observations.

With respect to Energy Safety's conclusion of a data inaccuracy for this location in our 2025 Q4 Quarterly Data Report (QDR) for WMP Initiative 8.1.2.1, Covered Conductor Installation - Distribution, PG&E respectfully disagrees.

Spatial QDR data reflects a snapshot of project scope and geometry and may not reflect the final construction job package. PG&E explained that construction drawings provide the project-specific record used to report completed WMP work. The reported discrepancy that is the subject of this NODI does not affect the underlying completion of the broader Grid Design and System Hardening initiative or PG&E's overall progress toward applicable Wildfire Mitigation Plan targets. PG&E explained this QDR data limitation in its response to NODI_PAD_PGE_BKA_20251105_1110 on April 6, 2026.

PG&E provides the narratives below to:

- (1) Clarify the intended use and limitations of PG&E's QDR reporting data;
- (2) Explain the circumstances that resulted in the reported discrepancy for Grid Hardening ID 35549057 and Structure ID 121554057; and
- (3) Describe proposals to align with Energy Safety.

Project Specific Information

For Grid Hardening ID 35549057, the final construction drawing reflects the project scope and conductor installation. The drawing identifies PM 35549057 and documents the project's installed conductor and associated construction configuration. Accordingly, the spatial-data discrepancy identified at Structure ID 121554057 should be distinguished from the work constructed and documented for the project. PG&E is providing the applicable construction drawing as Attachment 1 to

support Energy Safety's review. Please refer to supplemental document titled "*PGE_NODI_PAD_IAG_20260428_1456_20261016_ATCH001_CONF.pdf*".

Proposed Resolution

As noted in past responses, to better align QDR data, also referred to as Wildfire Mitigation Data Report (WMDR) data, with its intended use, PG&E has proposed options such as annual true up or year-to-date cumulative reporting, acceptance of supplemental construction job packages for completed work, and use of point geometry schemas to depict general work locations rather than preliminary line geometry. PG&E raised these data use and timing limitations with Energy Safety in the Fourth Quarter 2025 Wildfire Mitigation Plan Data Report Cover Letter.¹

For project-level field verification, PG&E continues to recommend that Energy Safety review the applicable construction job package for such verifications, which we can provide upon request when the completed work is selected for review.

PG&E welcomes continued coordination with Energy Safety regarding appropriate use of these datasets.

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 & Project Supervisor, Energy Safety
Romeo Marroquin Ajcac, Field Inspector, Energy Safety

¹ ¹ Pacific Gas and Electric Company, Fourth Quarter 2025 Wildfire Mitigation Plan Data Report Cover Letter, filed with the California Office of Energy Infrastructure Safety, February 1, 2026, available on OEIS public docket.