



April 15, 2025

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## NOTICE OF VIOLATION

Mr. Jarrod Meier:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Pacific Gas and Electric (PG&E) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a violation. Energy Safety therefore issues PG&E a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.<sup>1</sup>

On February 25, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Sebastopol in High Fire District (HFTD) Tier 2. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.2.2.2.3 VM for Operational Mitigations (VMOM), PGE failed to adhere to its protocol of wood and slash management near pole ID 102009724 near coordinates 38.403608, -122.896853. Energy Safety considers this violation for adherence to protocol to be in the "Minor" risk category.

### Response Options

In accordance with Energy Safety Guidelines,<sup>2</sup> within 30 days from the issuance of this NOV, PG&E must provide a response informing Energy Safety of corrective actions taken or planned to remedy the above identified violation and prevent recurrence. Alternatively, should PG&E disagree with the NOV, PG&E must submit to Energy Safety a response stating it disagrees with the violation, the reason or justification for the disagreement and all supporting documentation.<sup>3</sup> This response shall be filed in the Energy Safety e-Filing

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<sup>1</sup> Cal. Code Regs., tit. 14, section 29302(b)(2)

<sup>2</sup> Energy Safety Compliance Guidelines, pp 4-5

<sup>3</sup> Energy Safety Compliance Guidelines, pp. 4-5

system under the 2024 NOV Docket<sup>4</sup> and the associated file name(s) must begin with the NOV identification number provided above.

PG&E may also request an informal conference with Energy Safety's Environmental Science Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the 30- day response deadline. <sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [environmentalscience@energysafety.ca.gov](mailto:environmentalscience@energysafety.ca.gov), with a copy sent to [Akiko.Masuda@energysafety.ca.gov](mailto:Akiko.Masuda@energysafety.ca.gov). Pursuant to Government Code section 15475.4, if PG&E intends to request a hearing "to take public comment or present additional information," it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Pursuant to Public Utilities Code section 8389(g), Energy Safety may refer this matter to the California Public Utilities Commission for consideration of potential enforcement action.

Sincerely,



Sheryl Bilbrey  
Program Manager | Environmental Science Division  
Office of Energy Infrastructure Safety  
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Cc:

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<sup>4</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV>

<sup>5</sup> Energy Safety Compliance Guidelines, p. 4



# INSPECTION REPORT

## Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk. A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation’s execution of its WMP initiatives.

Energy Safety has designated is a violation as “Minor” risk. PG&E must correct the violation pursuant to the timeline provided in Table 1.<sup>6</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Violation correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tier 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>

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<sup>6</sup> Energy Safety Compliance Guidelines, p. 3



# Inspection Summary

The inspection location and WMP initiative summary is included in Table 2. The WMP inspection violation is included in Table 3.

***Table 2: Inspection Location and WMP Initiative Summary***

Electrical Corporation:	Pacific Gas and Electric
Report Number:	NOV_ESD_PGE_GCA_20250225_1059
Inspector:	Gary Candelas
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety inspected the locations based on PGE’s Q4 QDR.
Relevant WMP Initiative(s):	8.2.2.2.3 VM for Operational Mitigations (VMOM)
Date of inspection:	February 25, 2025
City and/or County of Inspection:	Sebastopol, California
Inspection Purpose:	Assess the accuracy of PG&E’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

**Table 3: WMP Inspection Violation**

Violation #	Near Structure ID	VMP ID	Lat/Long	HFT D	Initiative Number	Violation Type	Severity	Correction Timeline	Violation Description
Violation 1	102009724	RX-03711354 & RX-03711632 & RX-03711546	38.403608, -122.896853	Tier 2	8.2.2.2.3 VM for Operational Mitigations (VMOM)	Adherence to Protocol	Minor	12 months or resolution schedule included in WMP update	Failure to manage slash.

# Inspection Findings

## Violation 1:

### **Relevant Requirement:**

PG&E's WMP initiative 8.2.3.2 Wood and Slash Management states, "...Utility work on vegetation creates debris and wood products which, if left unmanaged, can become fuel for wildfire. PG&E is required to reduce or adjust live fuels as they are generated from programs developed to comply with PRC [Public Resources Code] 4293, General Order 95 Rule 35 and Pub. Util. Code [Public Utility Code] 8386."<sup>7</sup>

PG&E's WMP initiative continues, "PG&E's VM [vegetation management] Programs define debris as material less than 4 inches in diameter and large wood as material greater than 4 inches in diameter.... Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations...."<sup>8</sup>

PG&E's WMP lists the following governing standard for its slash management program, "Best Management Practices (BMP) for Vegetation Management Activities (TD-7102P-01-JA01)."<sup>9</sup> PG&E's protocol TD-7102P-01-JA01 states, "Woody debris created by chipping, lop and scatter, or brush mowing operations must be left at an average depth of less than 18 inches from the ground surface unless otherwise specified in an easement or land owner agreement."<sup>10</sup>

### **Finding:**

Energy Safety considers Violation 1 "Minor" because the slash pile is over 18-inches in height, creating a potential fuel source for wildfire.

At VMP ID RX-03711354, RX-03711632, and RX-03711546, near coordinates 38.403608, -122.896853, PG&E reported work completed under its VMOM program. According to PG&E's Q4 data reports, crews removed three Douglas firs (*Pseudotsuga menziesii*). The first tree, removed on October 31, 2024, was 110 feet tall and

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<sup>7</sup> PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 277

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April. 2, 2025).

<sup>8</sup> PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April. 2, 2025).

<sup>9</sup> PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April. 2, 2025).

<sup>10</sup> Pacific Gas and Electric Company. (n.d.). *General best management practices for all VM* (TD-7102P-01-JA01) (Rev. 1, Jan. 6, 2022), p. 12

(<https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-7102p-01-ja01-general-best-management-practices-for-all-vm.pdf>, accessed Oct. 16, 2024).

27 inches in diameter. The second, removed on November 1, 2024, was 60 feet tall and 11 inches in diameter. The third, also removed on November 1, 2024, was 115 feet tall and 21 inches in diameter.

Energy Safety's inspector observed slash, wood chips, and woody debris from these Douglas firs, most of which appeared to have been felled and left in place. Additionally, the inspector observed a pile of slash debris, which was approximately 60 inches in height. The inspector's observation is documented in Violation 1 photographs, which are exhibits to this report. Photo numbers Item1IA1Img0, Item1IA1Img1, Item1IA1Img2, depict a slash pile approximately 60 inches in height, and Item1IA1Img3, Item1IA1Img4 depict several other slash piles, chips and woody debris associated with PG&Es work.

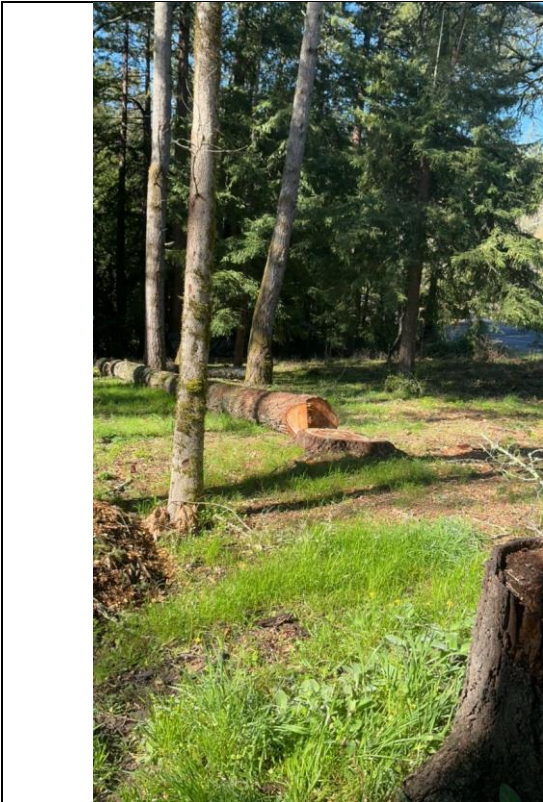
Energy Safety sent PG&E Data Request (DR) OEIS-E-INP\_2024-PG&E-02 on March 25, 2025, inquiring about the vegetation management activities at the site. PG&E's response to the DR confirmed that the slash, chips and woody debris was associated with VMP ID RX-03711354, RX-03711632, and RX-03711546.

# Exhibits

Exhibit A: Photo Log

Structure ID: 102009724

Violation 1:



**Item1Gimg1:** Photo of the first Douglas fir cut down.



**Item1IA1img0:** Photo of measurement tape showing the pile of slash at approximately 5 feet (60 inches) in height.





**Item1IA1img1:** Photo of the pile of slash measured at approximately 5 feet (60 inches) in height.



**Item1IA1img2:** Closer view of the pile of slash measured at approximately 5 feet (60 inches) in height.



**Item1IA1img3:** Photo of the second Douglas fir cut down

**Item1IA1img4:** Photo of the third Douglas fir cut down and the area showing slash and wood debris left near the coordinates.