



June 19, 2025

Jerrold Meier
Director, Electric Compliance
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

NOTICE OF VIOLATION

Mr. 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 Company (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.¹

On January 29, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Cool, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.1 -Covered Conductor Installation - Distribution, PG&E failed to adhere to data accuracy on pole ID 121530972, Grid Hardening ID 35293673 at coordinates 38.896734279315865, -121.00891927372464.

¹ Cal. Code Regs., tit. 14, section 29302(b)(2)

Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.² Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.³

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket⁴ and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation 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.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.⁵ Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.Doherty@energysafety.ca.gov

² Energy Safety Compliance Guidelines, pp. 3

³ Energy Safety Compliance Guidelines, pp. 4-5

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

⁵ Energy Safety Compliance Guidelines, p. 4

Cc:

Jerrold Meier, PG&E

J7MJ@pge.com

Wade Greenacre, PG&E

WAG9@pge.com

Electric Data Requests

ElectricDataRequests@pge.com

Ivan Garcia, Energy Safety

Ivan.Garcia@energysafety.ca.gov

Samuel Isaiah, Energy Safety

Samuel.Isaiah@energysafety.ca.gov

Yana Loginova, Energy Safety

Yana.Loginova@energysafety.ca.gov

Shannon Greene, Energy Safety

Shannon.Greene@energysafety.ca.gov

Compliance@energysafety.ca.gov



INSPECTION REPORT

Overview

Inspection Categories

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) or subsequent filing, 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.

Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.⁶

Table 1. Risk Category and Correction Timelines

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

⁶ Energy Safety Compliance Guidelines, p. 3



Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	Pacific Gas and Electric Company
Report Number:	CAD_PGE_IAG_20250129_1617
Inspector:	Ivan Garcia
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.1 -Covered Conductor Installation - Distribution
Date of inspection:	January 29, 2025
City and/or County of Inspection:	Cool, El Dorado County
Inspection Purpose:	Assess the accuracy of PGE’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

Table 3: WMP Inspection Violation(s)

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	121530972	35293673	38.896734279315865, -121.00891927372464	Tier 2	8.1.2.1 - Covered conductor installation - Distribution	Data Accuracy	N/A	Inaccurate data provided on covered conductor installation.

Inspection Details

Violation 1

Relevant Requirement:

PGE's WMP states the following regarding initiative number 8.1.2.1 -Covered Conductor Installation – Distribution

1. “[Covered conductor (CC)] installation involves the replacement of bare overhead primary conductor (voltage between 2-21 kV) and associated framing with conductor that is insulated with abrasion-resistant polyethylene coating (generally referred to as “covered conductor” and occasionally as “tree wire”). Installing CC can help reduce the likelihood of faults, and by extension ignitions, due to line-to-line contacts, tree-branch contacts, and faults caused by animals.”⁷

Version 3.1 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2023 WMP initiatives:

2. “Electrical corporations must ensure location accuracy in their [geographic information system] data submissions...”⁸

Finding:

On pole ID 121394336, Grid Hardening ID 35293673 at 2344-2350 Talking Pines Ct, Cool, CA, 95614, USA, 38.896734279315865, -121.00891927372464, the inspector observed no covered conductor installation on the pole east of pole ID 121530972. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, depict no covered conductor installation. PG&E reported that work on WMP initiative 8.1.2.1 -Covered Conductor Installation – Distribution was completed at this location.

Energy Safety concludes there is a violation because of these facts:

1. PG&E reported that covered conductor was installed east of pole ID 121530972 in PG&E's 2024 Q2 QDR data.
2. Covered conductor was not installed east of pole ID 121530972.
3. A secondary distribution line and a secondary service pole were observed at this location, east of pole ID 121530972.

⁷ Pacific Gas & Electric Company, “PG&E 2023-25 Approved Wildfire Mitigation Plan,” January 8, 2024, p. 397. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>



⁸ Office of Energy Infrastructure Safety, “Data Guidelines, Version 3.1,” February 17, 2023, p. 10 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 121530972

Violation 1

 A close-up photograph of a cylindrical metal lattice tower. The tower is covered in a dense pattern of small holes. A yellow identification tag is attached to the tower, featuring a barcode and the number '121530972'. The background shows a clear blue sky and some green foliage.	 A photograph showing a utility pole in a rural setting. The pole is made of wood and has several power lines attached to it. A white transformer is mounted on the pole. In the foreground, there is a wooden fence and a grassy area. The background consists of trees and a clear blue sky.
<p>Item1Gimg1: Pole ID</p>	<p>Item1Gimg2: Overall pole</p>



Item1IA1img1: No covered conductor installed east of pole 121530972



Item1IA1img2: Pole east of 121530972 was observed as a secondary service pole.