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

RE: Energy Safety NOV ID: CAD_PGE_IAG_20250129_1617
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 June 19, 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 completed per the locations submitted in its Second Quarter (Q2) 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 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 NOV was identified from a January 29, 2025, inspection by Energy Safety in the vicinity of the city of Cool, CA, in High Fire Threat District (HFTD) Tier 2 of PG&E’s Q2 QDR report for WMP Initiative 8.1.2.1 – Covered Conductor Installation (Distribution), Utility Initiative GH-01:

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.

Response

PG&E respectfully disagrees with Energy Safety’s conclusion of the above asserted violation. There was no violation because PG&E accurately reported the completion of Covered Conductor Installation (Distribution) of an Undergrounding/System Hardening subproject 35293673, also known as Grid Hardening (GH) ID 35293673. PG&E’s data on GH ID 35293673 accurately reflects the As-built construction and the span identified is a grid-hardened configuration. However, because final mapping of a project lags several months behind construction completion, the Q2 2024 QDR did not yet reflect the completed mapping of the project whose design had been changed from the planned design depicted in that Q2 2024 QDR.

PG&E has consistently communicated to and informed Energy Safety—through our Spatial Quarterly Data Report (QDR) submissions, Joint Utility QDR quarterly data check-ins, data request responses, public comments, and informal meetings with Energy Safety—that “construction complete” in the field does not equate to complete mapping in our source systems.¹

We have also advised that QDRs should not be used for Energy Safety’s field verification due to data schema, reporting guidelines, and timing limitations. Instead, PG&E recommends that construction job packages be used for such verifications, which we can provide upon request when a subproject is selected for review.²

The QDRs represent a snapshot in time of mapping data in PG&E’s Geographic Information System (GIS), reflecting only what work has been received, processed, and mapped by GIS technicians. For example, a job completed one day before the quarter ends will not appear in the corresponding QDR as fully mapped, as it must go through additional QA/QC, clerical review, and data processing before mapping is finalized.

^{1&2} On October 1, 2024, 1:00 PM PST, PG&E met with Mr. Doherty and other Energy Safety personnel to reiterate the “construction complete” and “mapping complete” processes for PG&E projects, QDR reporting limitations, as well as our suggestion to for inspectors to use only construction job packages for field verification. This is because the QDR is not an appropriate report for such activities. After the call, PG&E provided a construction job package for GH ID 35342143 to Energy Safety per their request.

Mapping field work to our source systems is a normal part of post-construction workflows. Until mapping is complete, detailed information resides in design systems and paper packages, not our GIS source system. Therefore, in the spatial QDR, Energy Safety may receive geometry based on preliminary mapping that is subject to future updates.

These timing and data-use challenges are not unique to PG&E. SCE and SDG&E have voiced similar concerns regarding the QDR and it being used for field verifications. Joint Utilities collectively have recommended an annual true-up report or year-to-date cumulative reporting to better reflect the dynamic nature of mapping and the grid. These suggestions are documented in our V.4 Data Guideline adoption comments, resubmission cover letters, and public comments.

Energy Safety's guidelines request that data-use limitations be captured in the Status Report deliverable. PG&E's Status Reports clearly state:

"PG&E's mapped line geometry shows data as mapped in our source system when the report is generated. Please note that data mappings happen daily in our source system. As such, a completed, planned, or in-progress job may become more mapped and not fully reflected in this report."

In the case of GH ID 35293673, the geometry shown in the Q2 2024 Spatial QDR accurately reflected the mapping of the planned work at the time. However, final field construction diverged from the original design as follows:

- The covered conductor span east of pole 121530972 was removed.
- The transformer was relocated **one span west**.
- A 100' section of **1/0 TPX** secondary line was installed and hardened. According to PG&E standards³, **1/0 TPX** is insulated and therefore qualifies as overhead hardened (GH-01).

For the span in question, the four images below demonstrate the change over time from the Q2 2024 Spatial QDR (Image 1), through construction (redlined construction drawings in Image 2) to final completed GIS mapping of the project as constructed (Images 3 and 4). In each of the four images below, PG&E includes an orange box for the area around the span.

³ PG&E's Electric Design Manual, Chapter 15 (TD-9001M-15)

Image 1: 2024 Q2 QDR Data

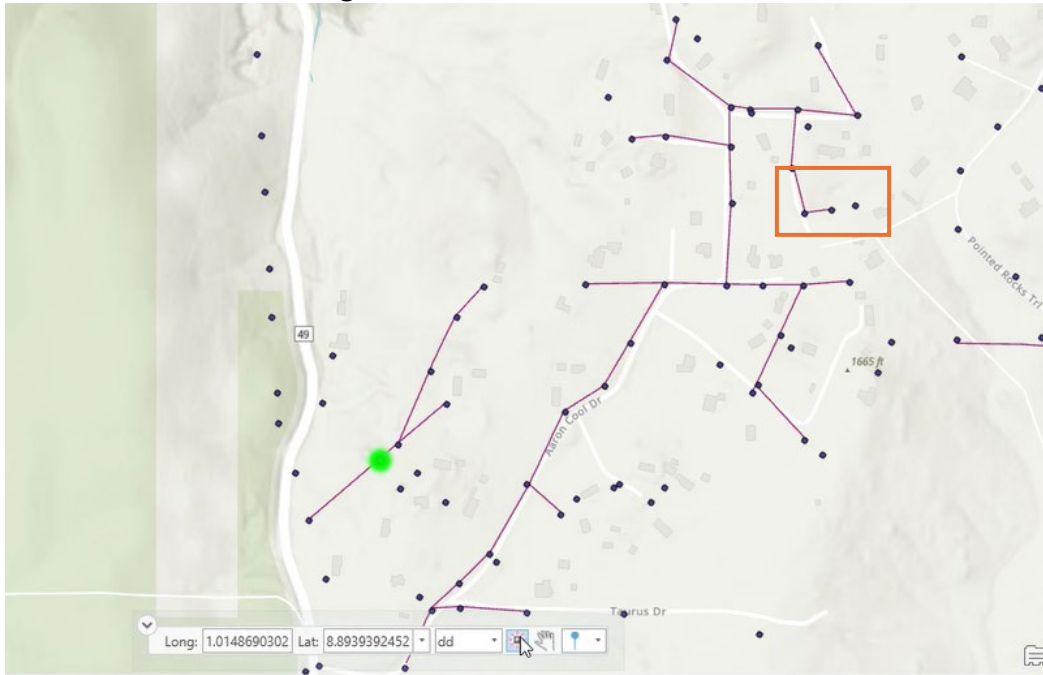


Image 1 is the Q2 2024 QDR data provided to Energy Safety for GH ID 35293673 where the distribution line was classified as "primary." The purple lines indicate primary distribution lines. The green dot was the latitude and longitude provided by Energy Safety.

Image 2: GH ID 35293673 Redlined As-Built

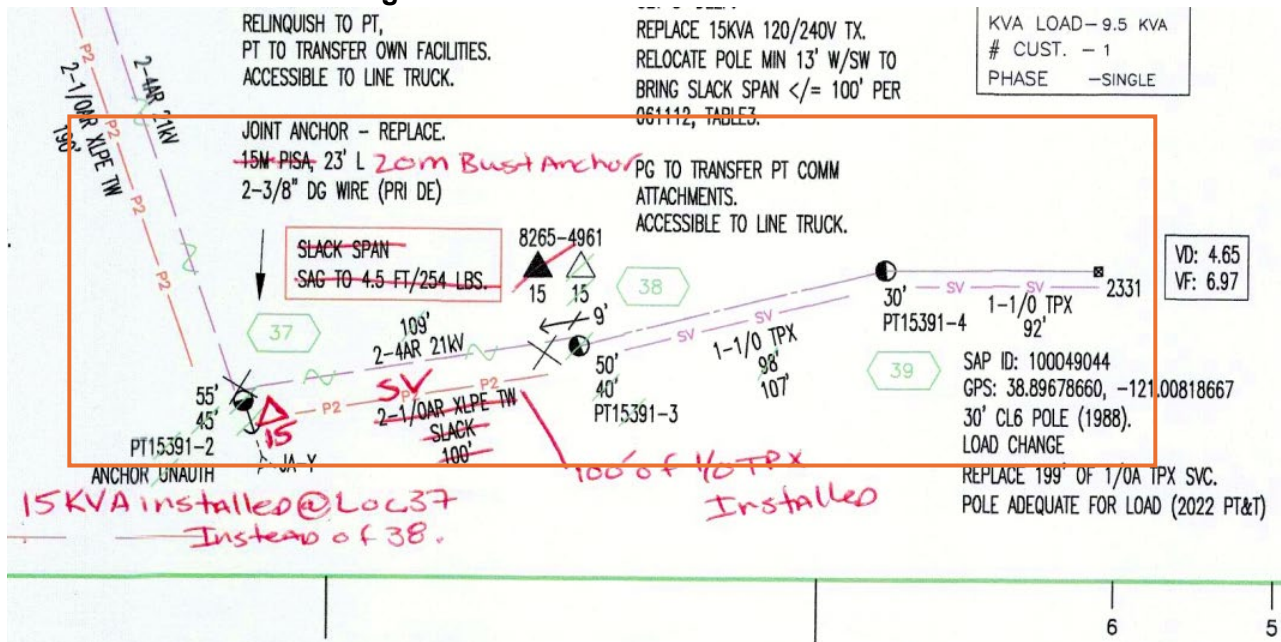


Image 2 is the redlined As-Built drawing that depicts the design change of the span east of pole 121530972 (Loc 37) from a primary line to a secondary line. Loc 37 is also where the transformer was installed.

**Image 3: SH ID 35293673 Updated Mapping:
Post Q2 2024 Submission [zoomed out view]**

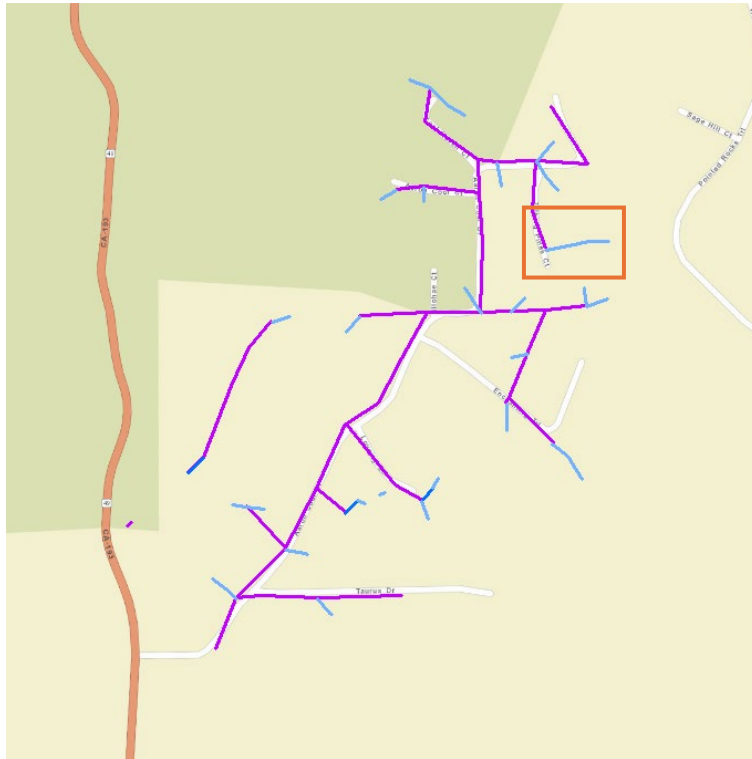


Image 3 depicts the broader project area in QDR format should the same QDR be created in the present (allowing more time for post construction complete activities such as project mapping). The purple lines indicate primary distribution lines and blue lines indicate secondary or service lines.

**Image 4: SH ID 35293673 Final EDGIS Mapping:
Post Q2 2024 Submission [zoomed in view]**

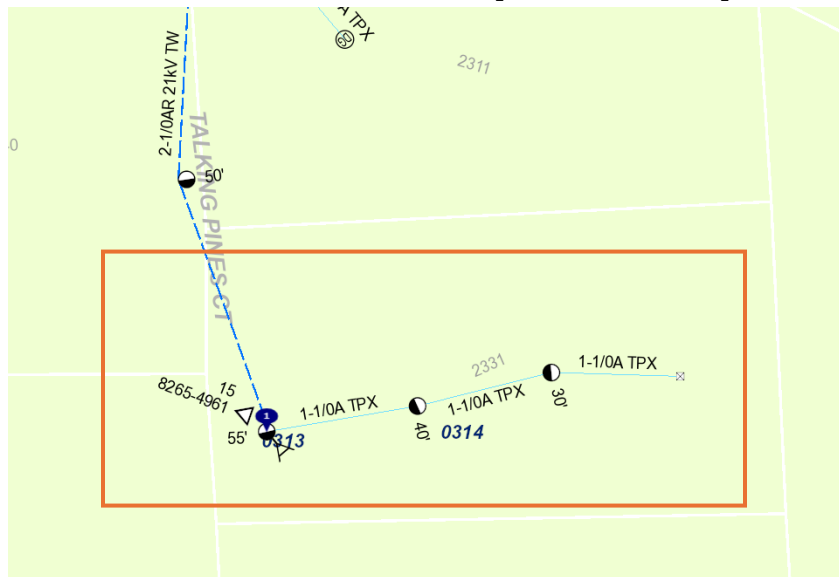


Image 4 is a snapshot as of August 20, 2024, which was after the Q2 QDR submission. This shows the secondary line as hardened east of the transformer (depicted by the triangle in the image above). The primary distribution line is the dashed darker blue line and secondary distribution line is the solid light blue line.

Please do not hesitate to contact me at WSComplianceMailbox@pge.com if you have any questions regarding this matter.

Sincerely,

Jerrold Meier,
Director, Electric Regulatory Compliance

Cc: Samuel Isaiah, Senior Utilities Engineer Specialist, Energy Safety
Yana Loginova, Program Manager, Energy Safety
Shannon Greene, Program Manager, Energy Safety
Ivan Garcia, Field Inspector, Energy Safety