

August 25, 2025

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

RE: Energy Safety NOV ID: CAD\_PGE\_IAG\_20250409\_1031  
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 July 24, 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 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 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 April 9, 2025 inspection by Energy Safety in the vicinity of the city of Corralitos, CA, in High Fire Threat District (HFTD) Tier 3 of PG&E's Q4 QDR report for WMP Initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses, Utility Initiative GH-10:

*Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses, PG&E failed to adhere to data accuracy requirements on pole ID 121168519, Grid Hardening ID 31660712 at coordinates 37.019623, -121.787386.*

## **Response**

PG&E concurs with Energy Safety's conclusion that pole ID 121168519 does not include a Non-Exempt Expulsion Fuse as stated in our 2024 Fourth Quarter (Q4) spatial Quarterly Data Report (QDR). However, PG&E consistently states the spatial QDRs should not be used alone for field verifications as there are data limitations. As it relates to our internal records and Geographic Information System (GIS) database, however, there are no data inaccuracies for the record in question. The Q4 2024 spatial QDR will be re-submitted by the next reporting period (November 1), as outlined in the OEIS' Data Guidelines Section 2.4 – Revisions to Previously Submitted Data which allow electrical corrections to make revisions once they become known.

For context, in 2022, we changed our workplan to include a relocation of Overhead (OH) Switch relocation from pole ID 121168519 to pole ID 121295048. This correction was completed under Request for Work (RW) ID 123632245 with a mapping completion date of February 25, 2023, which publishes the work in our GIS database.

When the workplan was made in 2023 for 2024, it likely reflected overflow work from the 2022 scoping. Mapping corrections happen in our source systems as part of standard work each day. Workplans capture work needing to be completed. For GH-10, there were 3,000-units of work to complete. Once the work has been completed (or otherwise canceled), the unit gets reduced from the workplan. Specific details regarding each unit on the workplan are not consistently reviewed against our GIS source system to see what mapping corrections may or may not have taken place. The goal remains to complete the workplan, not review the details regarding each unit. Specifics relating to the work performed remain in construction job packages.

PG&E has explained that our QDR submissions should not be used alone to support compliance field verifications due to data schemas, reporting guidelines, and timing limitations. Should it be used, we would appreciate the opportunity to provide a construction job package alongside the verification to ensure that the most accurate data is being used.

Please do not hesitate to contact [WSComplianceMailbox@pge.com](mailto:WSComplianceMailbox@pge.com) if you have any questions regarding this matter.

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 Manager, Energy Safety  
Cecilia Yaniz, Field Inspector, Energy Safety