

October 2, 2025

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_KSF_20250408_1326
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 September 2, 2025. The NOV arises out of 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 an April 8, 2025 inspection by Energy Safety in the vicinity of the city of Los Gatos, CA, in High Fire Threat District (HFTD) Tier 2. This work was reported as part of PG&E's Q4 QDR report for WMP Initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses, Utility Initiative GH-10. The violation states as follows:

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 on pole ID GT 105595, Grid Hardening ID 31661650 at coordinates 37.22828560877868, -121.99130148338494.

Response

PG&E concurs with Energy Safety's conclusion that pole ID GT 105595 does not include a Non-Exempt Expulsion Fuse as stated in our 2024 Fourth Quarter (Q4) spatial Quarterly Data Report (QDR). We determined that our records did not match the completed replacement of the Non-Exempt Expulsion Fuse with Solid Blade under operating number [REDACTED]. The pole ID GT 105595 shown in the Energy Safety provided photo, 'Item1GImg1', is not the structure where the work took place, but occurred at the relevant pole ID [REDACTED], as shown in "Image 1" and "Image 2."



Image 1: Correct structure (pole ID [REDACTED] with completed replacement Non-Exempt Expulsion Fuse with Solid Blades.



Image 2: Zoomed in view of pole ID [REDACTED] with completed replacement Non-Exempt Expulsion Fuse with Solid Blades.

The work was performed under job number 31661650 with a completion date of November 2, 2024. Based on our construction records, there was a misalignment with the installation location update and the initially planned installation location. The Non-Exempt Fuse with Solid Blade installation that took place was correct, but the update to the construction records did not occur which led to our geo-spatial data misalignment. As shown in “Image 3”, the updated installation location is highlighted, and a mapping correction was initiated under Request for Work (RW) ID 131710678 in response, with a completion date of September 15, 2025.

Circuit Map Change Sheet (CMCS)

 TD-9450S-F01
 Publication Date: 08/15/2016 Rev: 1

ILIS Event No.	GIS Tag No.	Control Center/AOR	DISTRIBUTION OPERATOR ENTRY	
Substation and Circuit Number	LOS GATOS 1108	Prepared By	Engineering Approval By	Map No. 11425
Purpose of Work	REPL Non-Exempt Fuse w/ SB	Notif	126535697	Job Number 31661650
Location		Town	Los Gatos	Date 11/01/2023
Construction Entry – New Installs or Removals				
Loc.	Equip No.	Serial No.	Manufacture	Date Manuf.
1	33479	n/a	n/a	n/a
			Location	Town
			37.22830537, -121.9911843	Los Gatos
			Pole SAP ID	100525794

Show the north arrow, adjacent switch numbers, and the names of streets or roads, adjacent intersections, or landmarks. Use a job sketch, if suitable. Sketches can be schematic but should approximate the geographic map.

Replace C/O 33479.
 Install Solid Blades and
 Fault Indicators at
 location.

Removed 2 - PT44 cutouts
 2 - 10T fuses

Installed 2 - PT44 cutouts
 2 - solid blades
 2 - Fault indicators

For adjacent/area
 devices, see next
 page schematic map



The foreman must immediately report any completed work. For partially completed work, circle the portion that was completed. Include the date and show "completed." Sheet 1 of 2

Work Completed By _____ Date 11-2-24 Recorded at control center by _____ Date _____

Mapped By _____ Date _____ Forward this completed form to _____ Date _____

Image 3: Construction record with incorrect installation location in the red box and the correct and updated location in the green box.

We see this finding as an opportunity to address our internal record discrepancies through the following:

- We will create internal communications for construction crews to document (redline) all changes and updates made during construction in adherence to our existing As-Built process.

The Q4 2024 spatial QDR will be re-submitted by the next reporting period (November 1, 2025), as outlined in the OEIS' Data Guidelines Section 2.4 – Revisions to Previously Submitted Data which allow electrical corporations to make revisions once they become known.

Please do not hesitate to contact 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
Keyshawn Ford, Field Inspector, Energy Safety