



December 22, 2025

Daniel Kushner  
Senior Director, Electric Risk & Compliance  
Pacific Gas and Electric Company  
300 Lakeside Drive  
Oakland, CA 94612

## NOTICE OF NON-PERFORMANCE

Mr. Kushner:

Pursuant to Government Code section 15472, et seq, 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 non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON), identifying non-performance with its approved WMP.

On July 30, 2025, Energy Safety conducted an inspection of Pacific Gas and Electric Company's WMP initiatives in the vicinity of the city of Arroyo Grande, California. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.1 - Downed Conductor Detection (DCD) Devices, PG&E failed to complete installation of a Downed Conductor Detection device on Pole ID 121426400, Grid Hardening ID {02896B1A-0763-4C6D-956E-B1F4B47D7741} at coordinates 35.175662, -120.525458. Energy Safety considers this non-performance to be in the Minor risk category. PG&E must complete a corrective action for this deficiency by 12 months from date of this notice.<sup>1</sup>

Within 30 days from the issuance date of this NON, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency or deficiencies.

This response shall be filed in the Energy Safety e-Filing system under the 2024 NON Docket<sup>2</sup> and the associated file name(s) must begin with the NON identification number.

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<sup>1</sup> Gov. Code section 15475.2(a)(2)

<sup>2</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NON>

Prior to its response, the electrical corporation may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than five (5) business days before the response deadline.<sup>3</sup> Requests for informal conference with Energy Safety must be e-mailed to [compliance@energysafety.ca.gov](mailto:compliance@energysafety.ca.gov), with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,



Patrick Doherty  
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Office of Energy Infrastructure Safety  
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<sup>3</sup> Energy Safety Compliance Guidelines, p. 4



# 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 Non-Performance (NON) is issued for any deficiencies discovered during an inspection related to an electrical corporation's performance of its WMP initiatives.

### Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency.<sup>4</sup> If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines provided in Table 1.<sup>5</sup>

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

Risk Category	Deficiency 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 Tiers 2 or 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>4</sup> Gov. Code section 15475.2(a)(2)

<sup>5</sup> 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 deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies 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_20250730_1537
Inspector:	Ivan Garcia
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.10.1 – Down Conductor Detection Devices
Date of inspection:	July 30, 2025
City and/or County of Inspection:	Arroyo Grande, San Luis Obispo County
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 Deficiencies***

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	121426400	{02896B1A-0763-4C6D-956E-B1F4B47D7741}	35.175662, -120.525458	Tier 2	8.1.2.10.1 – Down Conductor Detection Devices	Minor	Failure to install DCD.

# Inspection Details

## Deficiency 1

### Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.1.2.10.1 – Down Conductor Detection Devices:

1. “DCD technology can improve the ability to detect and isolate high impedance faults before an ignition can occur. This technology and the algorithms associated with it are hardware vendor specific but are being commonly referred to as DCD for the purpose of this narrative. The engineering and programming of existing equipment capable of DCD and the installation of new equipment with DCD functionality helps to address high impedance fault conditions within the [High Fire Risk Area].”<sup>6</sup>
2. Installation of DCD on existing, new, and retrofitted recloser controllers is expected to reduce the number of ignitions due to high impedance line-to-ground faults by quickly detecting and de-energizing the fault, which is the primary existing gap in [Enhanced Powerline Safety Settings] protection on primary overhead distribution conductor.<sup>7</sup>

### Finding:

On Pole ID 121426400, Grid Hardening ID {02896B1A-0763-4C6D-956E-B1F4B47D7741} at Lopez Dr, Arroyo Grande, CA, 93420, USA, 35.175662, -120.525458, the inspector observed that no DCD device was installed at the subject pole. The inspector's observation is documented in Deficiency 1 photographs, which are attached to this report. Photo numbers Item1GImg1 and Item1IA1Img1 depict incomplete installation of a DCD device. In the 2024 Q4 Quarterly Data Report submission, PG&E reported that work on WMP initiative 8.1.2.10.1 – Down Conductor Detection Devices was completed at this location.

Energy Safety concludes there is a deficiency that because of these facts:

1. No DCD device was observed at the subject pole.

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<sup>6</sup> Pacific Gas & Electric Company, “PG&E 2023-25 Approved Wildfire Mitigation Plan R6,” July 5, 2024, p. 461. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>

<sup>7</sup> Pacific Gas & Electric Company, “PG&E 2023-25 Approved Wildfire Mitigation Plan R6,” July 5, 2024, p. 461. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>

# Exhibits

Exhibit A: Photo Log

Structure ID: 121426400

Deficiency 1

	
<p>Item1GImg1: Overall Structure</p>	<p>Item1GImg2: Structure ID</p>



**Item1IA1img1:** No DCD installed at this pole