

March 04, 2026

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

RE: Energy Safety NODI ID: PAD\_PGE\_AXS\_20251104\_1051  
Notice of Nonperformance: Government Code §§ 15475.1(a) and 15475.2(a)(2), 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 Data Inaccuracy (NODI) dated February 3, 2026, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2025 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 Government Code Section 15475.2**, states:

- (a) *The office may issue a notice of defect or violation to direct the regulated entity to correct any defect or noncompliance with the approved wildfire mitigation plan or failure to comply with any laws, regulations, or guidelines within the authority of the office.*

**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 NODI was identified from an November 4, 2025 inspection by Energy Safety in the vicinity of the city of Placerville, CA, a Tier 2 High Fire Threat District (HFTD) of PG&E’s 2025 Q2 QDR report for WMP Initiative 8.1.2.10.1 – Down Conductor Detection Devices (DCD), Utility Initiative GM-06:

*Data Inaccuracy 1. Energy Safety observed that on pole ID 121157324, Grid Hardening ID 5020410E-2BAC-41B3-8668-E49899519422 at coordinates 38.7239480000341, -120.788760000523, the inspector observed that P&GE failed to adhere to data accuracy.*

## **Response**

PG&E concurs with Energy Safety’s observation. A complete review of the as-built work package for this Down Conductor Detection (DCD) equipped line recloser indicate that this device was originally mis-mapped when entered into ED GIS. The coordinates originally provided in the Quarterly Data Report as sourced directly from ED GIS were approximately 100 yds away from where the actual location was constructed. The correct location of this DCD aligns with the location reported by Energy Safety.

- The DCD equipped line recloser mapping records has been updated to reflect the correct pole location in ED GIS as indicated in the ED GIS screenshot in the attachment “PGE\_NODI\_AXIS\_20251104\_1051\_Atch01\_20260304\_CONF.pdf”.
- PG&E will provide a revision for this DCD as part of the next Quarterly Data Report submission, which is scheduled for May 1, 2026.

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 & Project Supervisor, Energy Safety  
Alexander Scott, Field Inspector, Energy Safety