

April 6, 2026

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

RE: **Energy Safety NODI\_PAD\_PGE\_BKA\_20251105\_1110**  
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 March 5, 2026, 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 statutory provisions:

**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.*

On November 5, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Greenwood, California. The inspection report is enclosed herewith. Energy Safety found the following data inaccuracies:

**Data Inaccuracy 1.** On Pole ID 121774370, Grid Hardening ID 35293664 at coordinates 38.8946392264835, -120.910976913624, the inspector observed that PG&E failed to adhere to data accuracy.

## **Response**

PG&E agrees with Energy Safety's observation of bare conductor between Pole ID 121774370 (southeast side) and Pole ID 121471467. No covered conductor was installed between those locations as intended and designed. Regarding Energy Safety's conclusion that PG&E's 2025 Q2 QDR includes data inaccuracies for installations at the locations identified in the Notice of Data Inaccuracy (NODI) and completion of WMP initiative 8.1.2.1 (Observation 1), PG&E respectfully provides this response to 1) clarify the intended use of PG&E's Q2 QDR data and 2) provide recommendations to remedy the misunderstanding. PG&E also explains below why this data inaccuracy does not affect PG&E's progress toward the WMP Grid Design and System Hardening Initiative.

### **1. Intended Use of QDR Data**

QDR data is submitted in both "spatial" and "non-spatial" form. "Spatial" QDR data represents a snapshot in time of preliminary scope and geometry for jobs and is not reflective of construction job packages that include construction drawings; please refer to supplemental document titled "*PGE\_NODI\_PAD\_BKA\_20251105\_1110\_20260406\_ATCH001\_CONF.pdf*". PG&E uses construction drawings ("non-spatial" QDR data) to report the completion of our WMP commitment to install 4,691 feet of covered conductor overhead hardening (Grid Hardening ID 35293664). PG&E's non-spatial QDR data did not report the installation of covered conductors between Pole ID 121774370 and Pole ID 121471767 (see southeast of Location 20 on PDF page 3 of attached construction drawing).

### **2. Recommendation to Remedy Misunderstanding**

To better align Wildfire Mitigation Data Report (WMDR) data with its intended use, PG&E has proposed options such as annual true up or year-to-date cumulative reporting, acceptance of supplemental construction job packages for completed work, and use of point geometry schemas to depict general work locations rather than preliminary line geometry. PG&E raised these data use and timing limitations with Energy Safety in the Fourth Quarter 2025 Wildfire Mitigation Plan Data Report Cover Letter.<sup>1</sup> PG&E recommends Energy Safety reference the construction job package for such verifications, which we can provide upon request when a subproject is selected for review. PG&E welcomes additional working sessions to align appropriate data use and ongoing collaboration efforts with Energy Safety to assess these recommendations. Table 1 below includes reported feet and miles and shows that PG&E met its WMP commitment.

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<sup>1</sup> Pacific Gas and Electric Company, Fourth Quarter 2025 Wildfire Mitigation Plan Data Report Cover Letter, filed with the California Office of Energy Infrastructure Safety, February 1, 2026, available on OEIS public docket.

**Table 1. Order 35293664 Reported Feet and Miles**

Order	Order Description	Location From	Location To	Span Length Feet	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	1	4	160	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	4	6	80	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	6	9	244	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	9	12	242	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	12	14	245	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	14	15	71	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	15	17	266	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	17	18	237	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	18	20	151	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	15	21	83	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	21	22	102	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	22	23	249	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	23	25	204	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	25	26	224	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	26	27	178	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	27	28	227	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	28	30	225	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	30	31	246	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	28	29	327	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	28	32	241	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	32	33	14	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	33	34	222	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	34	35	71	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	35	39	151	
35293664	CWSP-MOUNTAIN QUARRIES 2101 LR1350 PH2.4	39	40	231	
				<b>Total Feet</b>	<b>4691</b>
				<b>Total Miles</b>	<b>0.888</b>

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: Romeo Marroquin Ajcac, Energy Safety  
Babak Kaviani, Energy Safety  
Samuel Isaiah, Energy Safety  
Shannon Greene, Energy Safety