



TRANSMITTED VIA ELECTRONIC MAIL

December 23, 2021

Lise H. Jordan
Senior Director
Pacific Gas and Electric (PG&E)
77 Beale St, Mail Code B23A
San Francisco, CA 94105

NOV_PGE_QP_ 20210304-01

NOTICE OF VIOLATION

Ms. Jordan,

Pursuant to Government Code § 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has completed a compliance assessment of PG&E and determined the existence of one or more violations. In accordance with Government Code § 15475.2 and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2), noncompliance with an approved wildfire mitigation plan (WMP) or any law, regulation, or guideline within Energy Safety's authority is considered a violation.

On March 4, 2021, PG&E submitted a letter regarding updates to its 2019 WMP and 2020 WMP progress (March 4th Letter). In the March 4th Letter, PG&E self-reported missed inspections of 63 hydroelectric substations in HFTD Tier 2 (39) and Tier 3 (24) in 2020 as part of executing Initiative 5.3.4.15 of its 2020 WMP. PG&E stated it had completed 105 transmission and distribution substation inspections not including the missed 63 hydroelectric substations.

Energy Safety staff reviewed PG&E's March 4th Letter and discovered the following violation:

1. PG&E's 2020 WMP states that it will complete "supplemental inspections once annually for all HFTD Tier 3 [sub]stations, on a three-year cycle for stations in HFTD Tier 2."¹ By its own admission in the March 4th Letter, in 2020, PG&E did not perform annual inspections of 24 hydroelectric substations in Tier 3, as stated in

¹ PG&E's 2020 WMP, Section 5.3.4.15 Substation Inspections, page 5-172



December 23, 2021

NOV_PGE_QP_ 20210304-01

its 2020 WMP. Energy Safety finds that this violation has a risk category of Moderate.

On March 12, 2021, PG&E submitted an update to the progress on the missed hydroelectric substations inspections (March 12th Letter). In the March 12th Letter, PG&E states that it has completed all enhanced inspections of Tier 3 substations, as indicated in Initiative 5.3.4.15 of its 2020 WMP.

In accordance with the Energy Safety Compliance Process, outlined in Table 1 below are the correction timelines for identified violations relative to their risk category. Within 30 days from the issuance date of this notice of violation (NOV), January 24, 2022, advise Energy Safety of corrective actions taken or planned by PG&E to remedy the above identified violation(s) and prevent recurrence. This response shall be filed on the Energy Safety e-Filing system under the 2021-NOV docket and the associated file name(s) must begin with the NOV identification number provided above.

Table 1 Energy Safety Violation Correction Timeline by Risk Category

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none"> • Immediate resolution
Moderate	<ul style="list-style-type: none"> • 2 months (in HFTD Tier 3) • 6 months (in HFTD Tier 2) • 6 months (if relevant to worker safety; not in HFTD Tier 3)
Minor	<ul style="list-style-type: none"> • 12 months or resolution scheduled in WMP update

Pursuant to Government Code § 15475.4(b), this NOV is served electronically, and PG&E may request a hearing to take public comment or present additional information. Per statute, the deadline to request a hearing is within 30 days from the issuance date of this NOV – January 24, 2022. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Pursuant to Public Utilities Code § 8389(g), following receipt of PG&E’s response to this NOV and resolution of any disputes, this matter will be referred to the California Public Utilities Commission (CPUC) for its consideration of potential enforcement action, as the CPUC deems appropriate.



December 23, 2021

NOV_PGE_QP_ 20210304-01

Sincerely,

A handwritten signature in black ink, appearing to read "Koko Tomassian".

Koko Tomassian
Program Manager
Compliance Assurance Division
Office of Energy Infrastructure Safety

Cc:
Melissa Semcer, Office of Energy Infrastructure Safety
MaryBeth Farley, Office of Energy Infrastructure Safety
Quang Pham, Office of Energy Infrastructure Safety
Anne Beech, PG&E
Robert Morales, PG&E
Safi Rizvi, PG&E
Electric Data Requests, PG&E