



TRANSMITTED VIA ELECTRONIC MAIL

December 23, 2021

Lise H. Jordan

NOV_PGE_QP_ 20210507-01

Senior Director

Pacific Gas and Electric (PG&E)

77 Beale St, Mail Code B23A

San Francisco, CA 94105

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 May 7, 2021, PG&E submitted a letter self-reporting missed General Order (GO) 165 and WMP Enhanced Inspections (May 7th Letter). In the May 7th Letter, PG&E admitted that it did not complete detailed overhead inspection of 3,296 poles in Tier 3 as part of its Wildfire Safety Inspection Program (WSIP), as indicated in its 2020 WMP. In its 2020 WMP, PG&E explains that inspections performed as part of its WSIP expedite and expand its detailed overhead inspections in Tier 2 and Tier 3 high fire-threat district (HFTD) areas.¹ These 3,296 poles had GO 165 inspection records but did not have WSIP inspection records in 2020.

Energy Safety staff reviewed the filing and discovered the following violation:

1. PG&E's 2020 WMP states that, in 2020, it will conduct "detailed overhead inspections on 100% of HFTD Tier 3, and 33% of HFTD Tier 2 assets."² PG&E did

¹ PG&E's 2020 WMP, Section 5.3.4 Asset Management and Inspections, page 5-153

² PG&E's 2020 WMP, Section 5.3.4.1 Detailed Inspections of Distribution Electric Lines and Equipment, page 5-156



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not perform detailed overhead inspections for 3,296 poles in Tier 3 as required. These poles had GO 165 inspection records but did not have WSIP inspection records in 2020. Energy Safety finds that this violation has a risk category of Moderate.

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 the process or procedural gaps that led to the missed inspections. 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.



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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