State of California – A Natural Resources Agency
Gavin Newsom, Governor

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
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Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

March 11, 2022

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

NOD_ MJ4_PGE_20211207_01

NOTICE OF DEFECT

Ms. Jordan,

Pursuant to Government Code Section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has completed a compliance assessment of Pacific Gas & Electric (PG&E) and determined the existence of one or more defects. In accordance with Government Code Section 15475.2 and the California Code of Regulations, Title 14, section 29302(b)(2), a deficiency, error, or condition increasing the risk of ignition posed by electrical lines and equipment is considered a defect.

On December 7, 2021 Mahdi Jahami, Energy Safety staff, conducted a walking inspection in Santa Cruz County and discovered the following defect(s):

1. Defect 1: Poles numbered 120784771, 120795203, 120786270, 120786268, and 120832674 had vegetation contacting guy wire above the insulator. Guy wires can become energized and pose an increased ignition risk if in contact with vegetation. Energy Safety considers this defect to be in the Minor risk category.
2. Defect 2: The structure numbered 121024191 had excessive splicing in a single span. Splices are used to connect two strands of conductor. Multiple splices on a single phase of a span indicates that the conductor has required repair multiple times. Therefore, a span with an excessive number of splices is an indicator of increased the risk of conductor failure and ignition. Energy Safety considers this defect to be in the Minor risk category.

In accordance with the Energy Safety Compliance Process, outlined in Table 1 below are the correction timelines for identified defects relative to their risk category. Within 30 days from the issuance date of this notice of defect (NOD), April 11, 2022, advise Energy Safety of corrective actions taken or planned by PG&E to remedy the above identified defect(s) and prevent

March 11, 2022 NOD_ MJ4_PGE_20211207_01

recurrence. This response shall be filed in the Energy Safety e-Filing system under the 2021-NOD docket and the associated file name(s) must begin with the NOD identification number provided above.

Table 1 Energy Safety Defect Correction Timeline by Risk Category

Risk Category	Violation and defect correction timeline
Severe	• Immediate resolution
Moderate	• 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	• 12 months or resolution scheduled in WMP update

Pursuant to Government Code Section 15475.4(b), this NOD 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 NOD – April 11, 2022. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOD become final.

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

Sincerely,

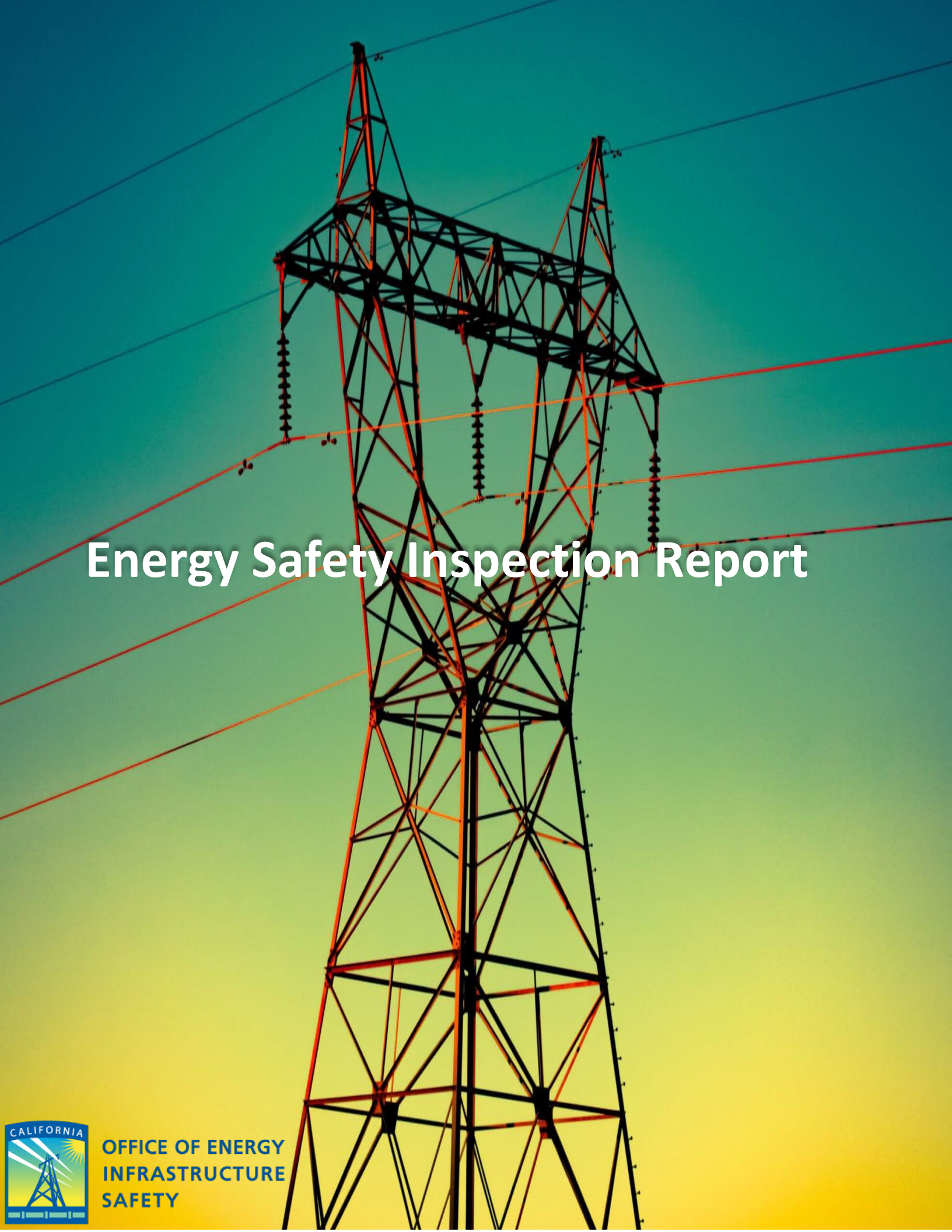
Koko Tomassian
Compliance Program Manager
Compliance Assurance Division
Office of Energy Infrastructure Safety

Cc:
Electric Data Requests, PG&E
Anne Beech, PG&E
Robert Morales, PG&E

March 11, 2022

NOD_ MJ4_PGE_20211207_01

Safi Rizvi, PG&E
Wade Greenacre, PG&E
Melissa Semcer, Energy Safety
MaryBeth Farley, Energy Safety
Mahdi Jahami, Energy Safety



Energy Safety Inspection Report

CALIFORNIA

OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY

Table of Contents

Report Name: MJ4_PGE_20211207_01
Date(s): December 7, 2021
Inspector: Mahdi Jahami
Utility: Pacific Gas and Electric (PG&E)

I. BACKGROUND

While wildfires are a natural part of California's ecosystem, the “fire season” in California and throughout the West is beginning and finishing earlier and later each year. Climate change and drought are believed to be a major contributor to this unsettling pattern. Utility-ignited wildfires are also a significant contributor to the wildfire risk in the Golden State, as this ignition cause category represents a disproportionate amount of the largest and most destructive fires in state history. Consequently, the Office of Energy Infrastructure Safety (Energy Safety) was established per the California Energy Infrastructure Safety Act (Government Code Sections 15470 – 15476) with the primary purpose of ensuring electrical corporations are reducing wildfire risk and complying with energy infrastructure safety measures. One such method for Energy Safety meeting its objective is to conduct detailed visual inspections of electrical infrastructure.

Inspections are carried out by Energy Safety’s Compliance Division on a regular basis to verify the work performed by utilities, as reported in approved wildfire mitigation plans (WMPs) or subsequent filings and assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk. Accordingly, Energy Safety inspections are distinguished into two lines of effort. Inspections related to an electrical corporation’s execution of its WMP initiatives is referred to as “WMP Initiative Inspections,” findings of which are detailed in Table 2. Issues discovered during these inspections are categorized as violations and are accompanied by a notice of violation (NOV). In addition to assessing compliance with WMP initiatives, Energy Safety inspectors also visually assess the electrical infrastructure and surrounding vegetation to determine whether conditions are present which increase an electrical corporation’s ignition and wildfire risk. These inspections are referred to as “General Wildfire Safety Inspections” and findings are detailed in Table 3 below. Issues discovered during these inspections are categorized as defects and are accompanied by a notice of defect (NOD).

This report details the findings of a recent Energy Safety inspection.

Section 15475.1. of the Government Code states that:

(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.

On December 7, 2021, Energy Safety inspector Mahdi Jahami performed a walking inspection in Santa Cruz in Santa Cruz County. The goal of this inspection was to verify the PG&E's installation of sectionalizing devices as part of its planned grid topology improvements under 2021 WMP initiative 7.3.3.8.1 (system automation devices) and approximately one mile of covered conductor installed as part of its system hardening initiative 7.3.3.17.1 (covered conductor). Detailed findings from this field inspection are laid out in Section II below.

II. RESULTS

In accordance with Energy Safety's Wildfire Mitigation Plan Compliance Process, violations and defects discovered by Energy Safety must be corrected in a timely manner. The timeline for corrective action is dependent on the risk category, location, and potential impact to worker safety of the violation or defect discovered. Risk categories range from severe to minor, and locational risks are determined with tier levels in the California Public Utility Commission's High Fire Threat District (HFTD) map. Table 1 below outlines violation and defect risk categories and their associated correction timelines. The correction timelines identified below apply to the results of both WMP initiative inspections as well as general wildfire safety inspections.

Table 1. Risk Category and Correction Timelines

Risk Category	Violation and defect correction timeline
Severe	• Immediate resolution
Moderate	• 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	• 12 months or resolution scheduled in WMP update

Table 2. General Wildfire Safety Inspections

Item	Structure ID	HFTD	Defect Type	Severity	Defect Description
1	121024191	Tier 3	Excessive splicing in single span	Minor	The center phase conductor has four splices
2	120784771	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation touching the guy wire above the insulator
3	120795203	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation touching the wire above the insulator
4	120786270	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation touching the wire above the insulator
5	120786268	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation touching the wire above the insulator
6	120832674	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation touching the wire above the insulator

III. DISCUSSION

During the inspection, Energy Safety discovered several instances where vegetation was in contact with a guy wire above the insulator. Guy wires are metallic and can become energized in some circumstances. Insulators break the current path and prevent electricity from reaching the ground where a down guy wire is anchored. However, the portion above the insulator may remain energized until the circuit is deenergized and may cause an ignition if in contact with vegetation while energized. Accordingly, Energy Safety considers vegetation in contact with down guy wires above the insulator a condition that increases an electrical corporation's ignition risk. Structures where vegetation was in contact with the guy wire above the insulator are noted in Table 2.

Energy Safety also discovered one instance of a conductor that had an excessive number of splices along a single phase of overhead conductor. Energy Safety considers the presence of three or more splices along a single phase of conductor to be excessive. This excessive splicing is indicative of potential issues with electrical loading, physical weakening of the line, or a pattern of repeated failures. The weakening of conductors can result in increased risk of conductor failure or arcing that could result in an ignition. Repeated failures and splicing of a particular phase conductor highlight that the span in question is subject to risk drivers that cause line failures and increase the risk of causing a potential wildfire ignition. The structure where three or more splices were observed is identified in Table 2.

IV. CONCLUSION

Pursuant to its objectives and statutory obligations, Energy Safety has completed the above referenced inspection and discovered violations and/or defects by PG&E. PG&E's required response to these non-compliances and options for hearing are detailed in the associated notice of violation and/or defect, respectively.

V. APPENDICES

APPENDIX A: Photo Log

Item Number 1

Structure ID: 121024191

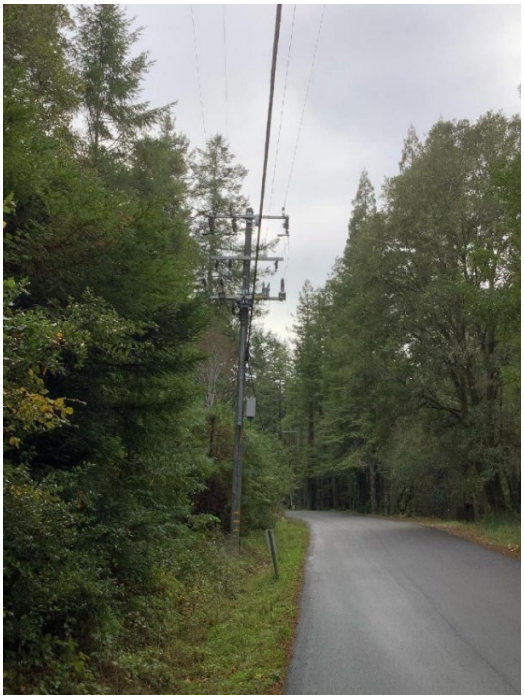


Photo 1: Picture of the entire pole

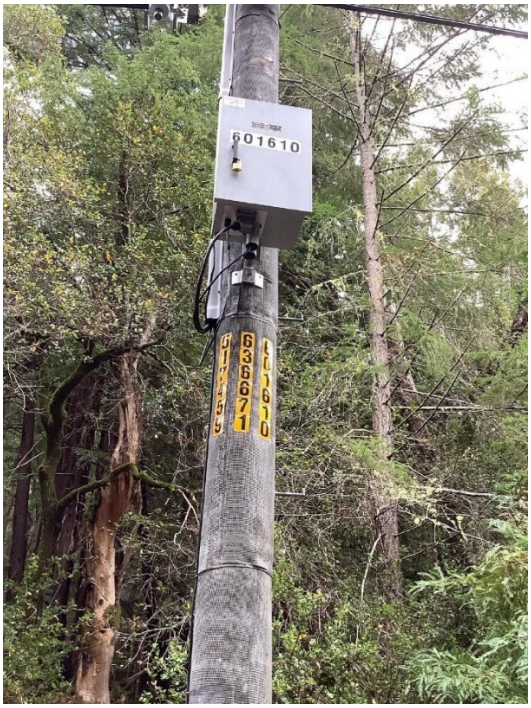


Photo 3: Line Recloser viper #601610

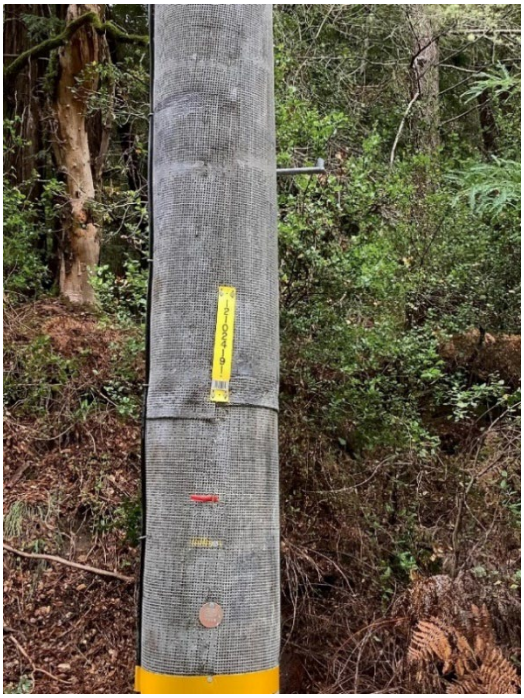


Photo 2: Picture of the Pole ID

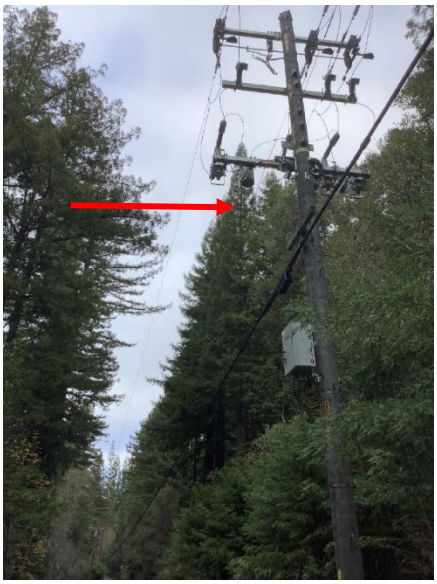


Photo 4: Picture of the primary conductors showing the middle phase conductor with four splices.

Item Number 2

Structure ID: 120784771

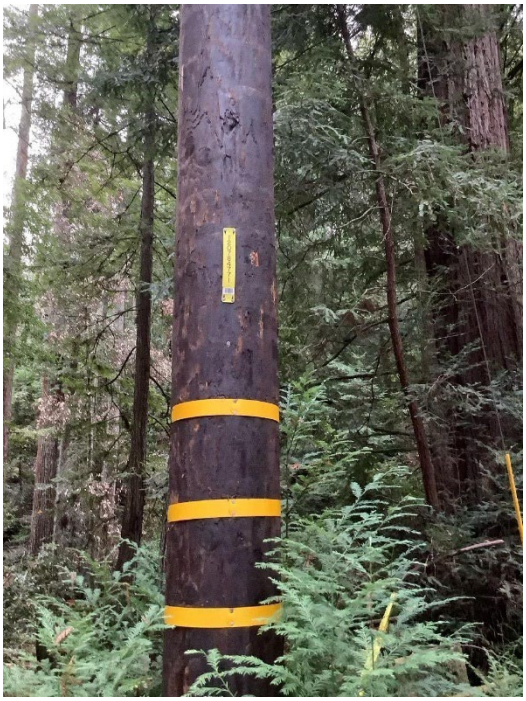


Photo 1: Picture of the Pole ID

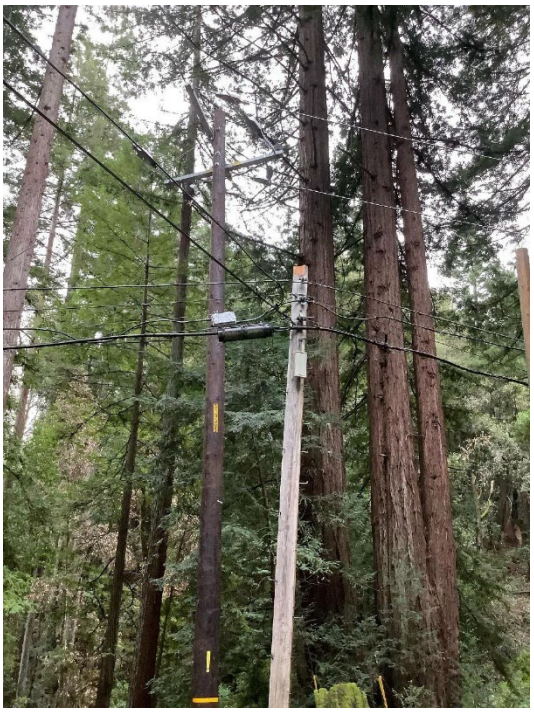


Photo 2: Picture of the entire Pole

Photo 3: Picture of vegetation contacting the guy wire

Item Number 3

Structure ID: 120795203

Photo 1: Picture of the Pole ID

Photo 3: Picture of vegetation contacting the guy wire

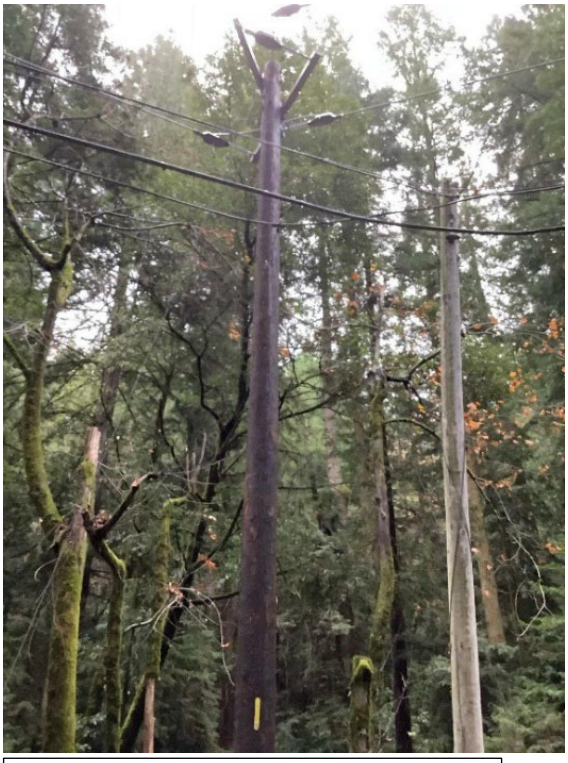


Photo 2: Picture of the entire Pole

Item Number 4

Structure ID: 120786270

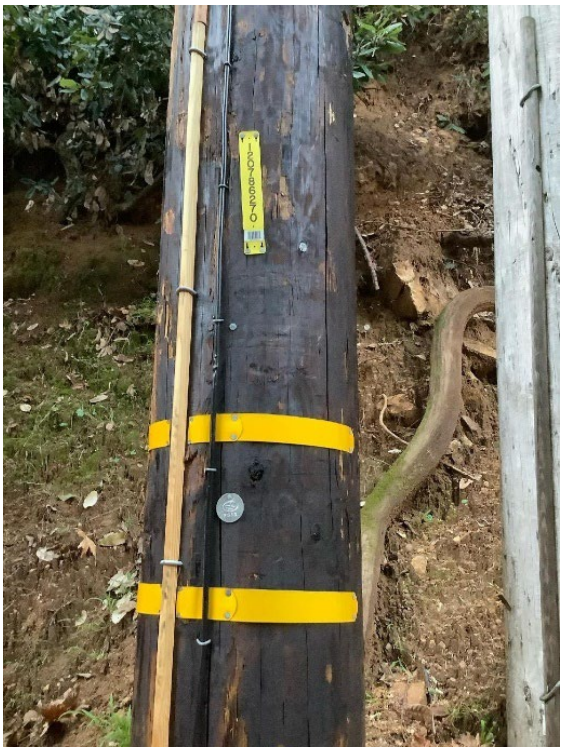


Photo 1: Picture of the Pole ID

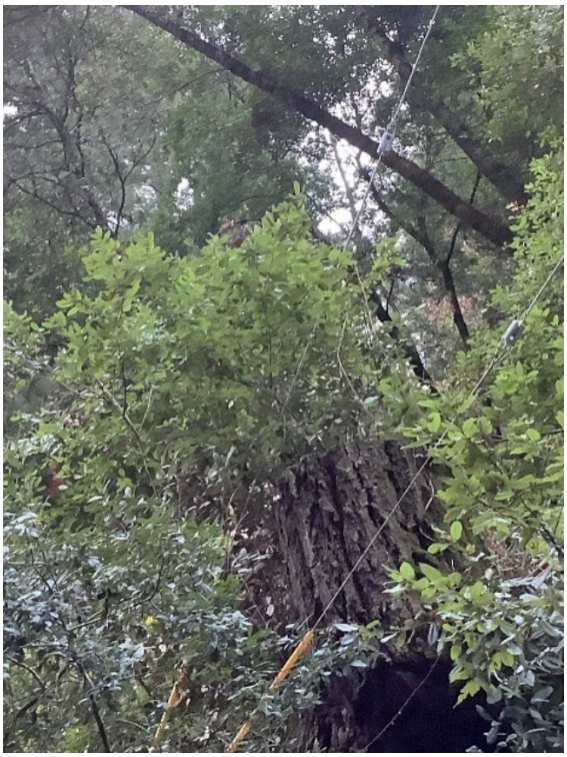


Photo 3: Picture of vegetation contacting the guy wire

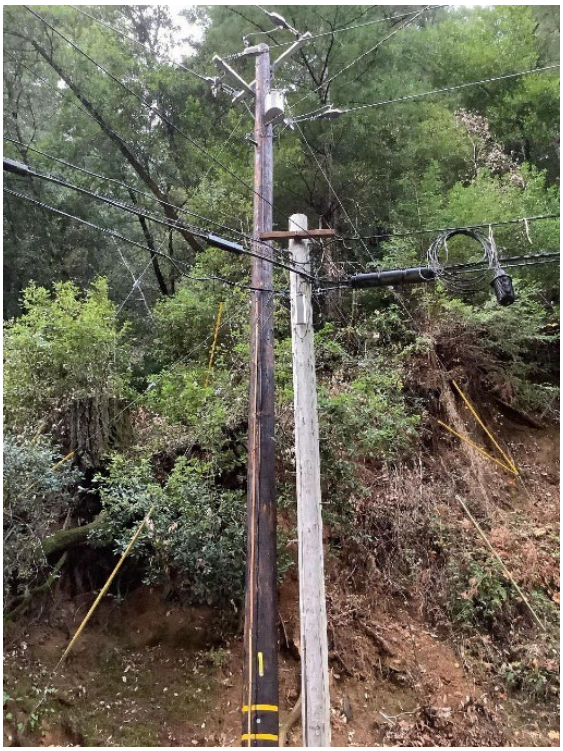


Photo 2: Picture of the entire Pole

Item Number 5

Structure ID: 120786268

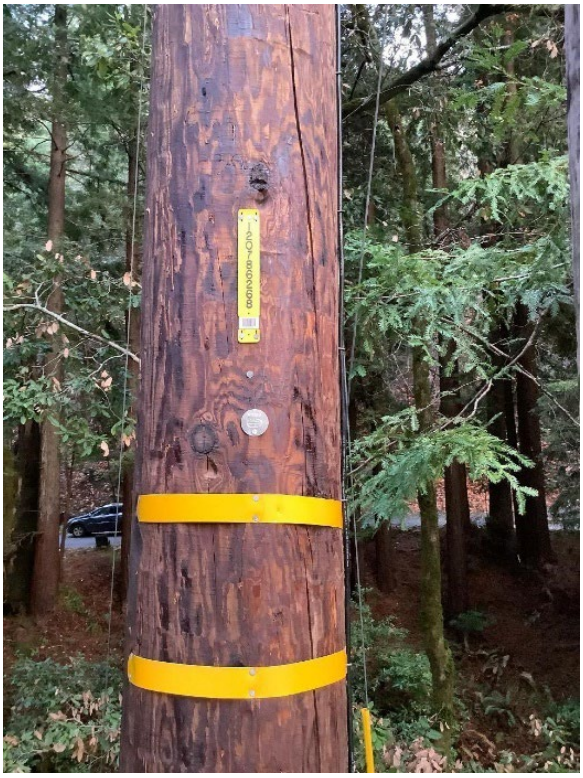


Photo 1: Picture of the Pole ID

Photo 3: Picture of vegetation contacting the guy wire

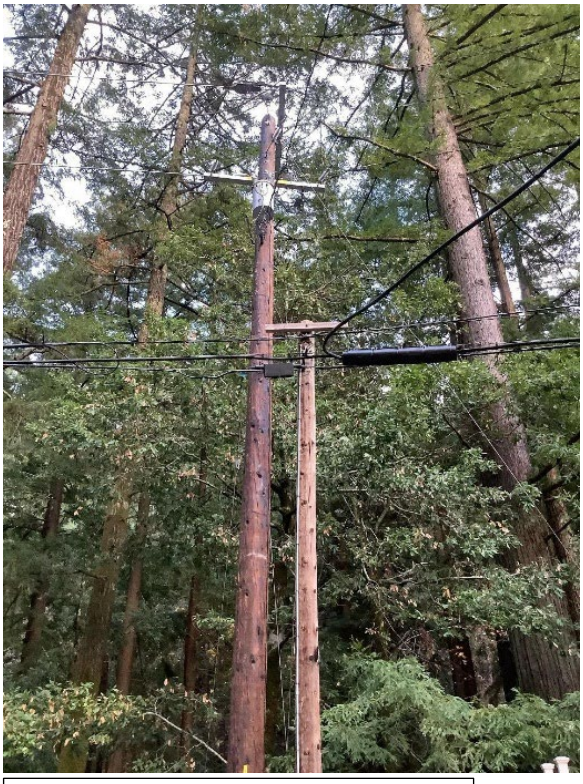


Photo 2: Picture of the entire Pole

Item Number 6

Structure ID: 120832674

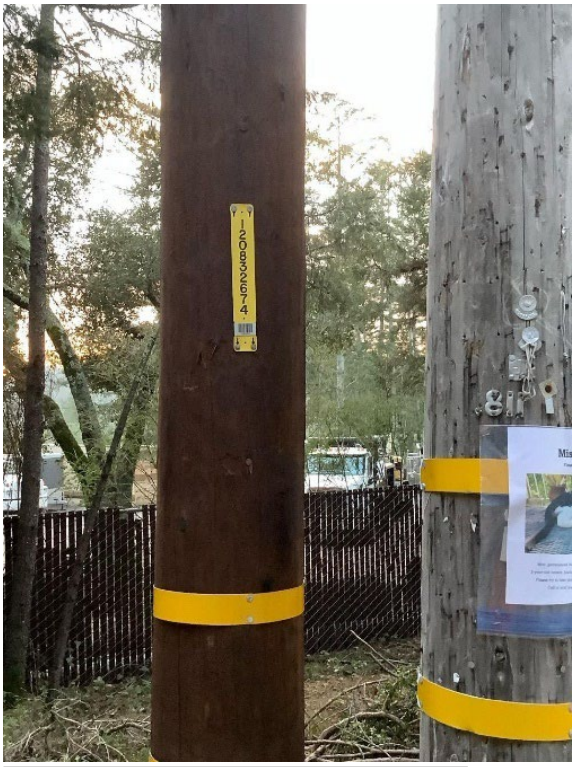


Photo 1: Picture of the Pole ID

Photo 3: Picture of vegetation contacting the guy wire

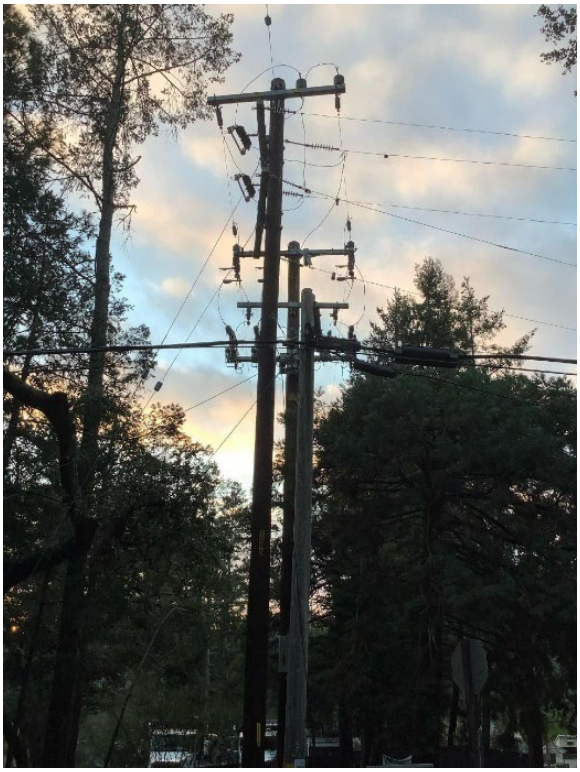


Photo 2: Picture of the entire Pole