State of California – A Natural Resources Agency
OFFICE OF ENERGY INFRASTRUCTURE SAFETY
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Gavin Newsom, Governor
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_PGE_ELZ_ 20211214-01

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 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.

Elizabeth McAlpine, Energy Safety staff, conducted an inspection of Enhanced Vegetation Management work near Shingle Springs in El Dorado County on December 14, 2021, and discovered the following defect(s):

1. Vegetation was found contacting guy wires above the insulator at structures numbered 101384818 and 101383904. 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.

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 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.

March 11, 2022 NOV_PGE_ELZ_20211214-01

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
Safi Rizvi, PG&E
Wade Greenacre, PG&E
Melissa Semcer, Energy Safety
MaryBeth Farley, Energy Safety
Elizabeth McAlpine, Energy Safety

Energy Safety Inspection Report

CALIFORNIA
OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY

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Report Name: ELZ_PGE_20211214-01
Date(s): December 14, 2021
Inspector: Elizabeth McAlpine
Utility: Pacific Gas and Electric (PG&E)
Attention: Lise H. Jordan, Senior Director Regulatory Compliance and Quality Assurance

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 14, 2021, I performed a walking inspection of the vegetation worked as part of PG&E's Enhanced Vegetation Management program[1] near the town of Shingle Springs. I was accompanied by Colin Lang, an Environmental Scientist with Energy Safety. The weather was approximately 42 degrees, clear, and there was a slight breeze. 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

[1] In accordance with PG&E's 2021 EVM program that are covered under, but are not limited to the following 2021 WMP vegetation management initiatives: 7.3.5.1, 7.3.5.2, 7.3.5.13, 7.3.5.15, and 7.3.5.20

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	101384818	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation contacting guy wire above the insulator
2	101383904	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation contacting guy wire above the insulator

III. DISCUSSION

During the inspection, vegetation contacting down guy wires above insulators was discovered at structures numbered 101384818 and 101383904, as noted in Table 2 above. 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 energized while in contact with vegetation. Accordingly, Energy Safety considers vegetation in contact with down guy wires above the insulator a condition that increases an electrical corporation's ignition risk. See photos labeled Item9GW2Img1 and Item9GW2Img2 for structure 101384818, and Item13GW2Img1 and Item13GW2Img2 for structure 101383904 in Appendix A.

IV. CONCLUSION

Pursuant to its objectives and statutory obligations, Energy Safety has completed the above referenced inspection and discovered violations and/or defects by Pacific Gas and Electric. Pacific Gas and Electric'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

Structure ID: 101384818

Figure 1 Item9GW2Img1: Picture of pole with Willow tree behind

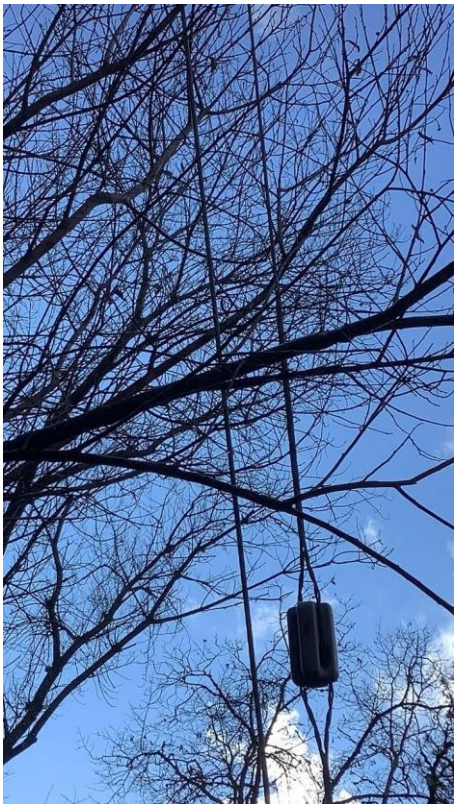

Figure 2 Item9GW2Img2: Photo of branches intertwined with guy wire above insulator

Structure ID: 101383904

Figure 3 Item13GW2Img1: Photo of pole tag with guy and guy insulator behind pole

Figure 4 Item13GW2Img2: Photo of Interior Live Oak branches touching guy wire above insulator

Figure 5 Item13GW2Img3: Red "X" on trunk of Interior Live Oak