



March 20, 2024

Vincent Tanguay
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Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

NOTICE OF VIOLATION

Mr. Vincent Tanguay:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Pacific Gas and Electric Company in accordance with its 2023 Wildfire Mitigation Plan (WMP) and determined the existence of one or more violations. Energy Safety therefore issues Pacific Gas and Electric Company a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.¹

On November 29, 2023, Energy Safety conducted an inspection of Pacific Gas and Electric Company's WMP initiatives in the vicinity of the city of Willits, California. The inspection report is enclosed herewith. Energy safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative 8.2.3.1 - Pole Clearing, Pacific Gas and Electric Company failed to adhere to a required protocol of pole clearing on pole number 121593291 at coordinates 39.4337627600458, -123.358669737352. Energy Safety considers this violation for failure to adhere to protocol to be in the Minor risk category.

Violation 2. Energy Safety observed that in implementing 2023 WMP initiative 8.2.3.1 - Pole Clearing, Pacific Gas and Electric Company failed to adhere to a required protocol of pole clearing on pole number 121469072 at coordinates 39.4156861011824, -123.348669453419. Energy Safety considers this violation for failure to adhere to protocol to be in the Moderate risk category.

¹ Cal. Code Regs., tit. 14, section 29302(b)(2)

Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.² Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.³

This response shall be filed in the Energy Safety e-Filing system under the 2023 NOV Docket⁴ and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation intends to request a hearing “to take public comment or present additional information,” it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.⁵ Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.Doherty@energysafety.ca.gov

Cc:

² Energy Safety Compliance Guidelines, pp. 5-6

³ Energy Safety Compliance Guidelines, pp. 6-7

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023%20NOV>

⁵ Energy Safety Compliance Guidelines, p. 6

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INSPECTION REPORT

Overview

Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk.

A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation’s execution of its WMP initiatives.

Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.⁶

Table 1. Risk Category and Correction Timelines

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 High Fire Threat District (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

⁶ Energy Safety Compliance Guidelines, p. 5



Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	Pacific Gas and Electric Company (PG&E)
Report Number:	PGE_CAC18_20231129_0945
Inspector:	CAC18
WMP Year Inspected:	2023
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	Pole Clearing (2023 WMP initiative number 8.2.3.1)
Date of inspection:	November 29, 2023
City and/or County of Inspection:	Willits, Mendocino County
Inspection Purpose:	Assess the accuracy of Pacific Gas and Electric Company’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

Table 3: WMP Inspection Violation(s)

Violation #	Structure ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	121593291	39.4337627600458, -123.358669737352	Tier 2	8.2.3.1 - Pole Clearing	Adherence to Protocol	Minor	Failure to achieve required clearance
Violation 2	121469072	39.4156861011824, -123.348669453419	Tier 2	8.2.3.1 - Pole Clearing	Adherence to Protocol	Moderate	Failure to achieve required clearance

Inspection Details

Violation 1:

Relevant Requirement:

Pacific Gas and Electric Company's WMP states the following regarding pole clearing:

1. "PG&E performs removal/clearing of vegetation around select Transmission and Distribution poles and towers..." and "...to maintain a firebreak of at least 10 [feet (ft)] in radius (out from the pole) up to 8 ft up from the ground."⁷

Finding:

On pole ID 121593291 at 24438-24798 N Highway 101, Willits, CA, 95490, USA, 39.4337627600458, -123.358669737352, the inspector observed that pole clearing was not completed per protocol. The inspector's observation is documented in Violation 1 photographs, which are attached to this report. Photo numbers Item1GImg1, Item1GImg2, Item1GImg3, and Item1A1Img1 depict customer-owned wood pallets inside the pole's 10 ft firebreak radius.

Energy Safety concludes that Violation 1 is Minor because of these facts:

1. The inspection point was reported as completed.
2. Customer-owned wooden pallets are inside the 10 ft. firebreak radius.
3. The pallets are made of wood, a flammable material.

Violation 2:

Relevant Requirement:

Pacific Gas and Electric Company's WMP states the following regarding pole clearing:

1. "PG&E performs removal/clearing of vegetation around select Transmission and Distribution poles and towers..." and "...to maintain a firebreak of at least 10 ft in radius (out from the pole) up to 8 ft up from the ground."⁸

Finding:

On pole ID 121469072 at Willits, CA, USA, 39.4156861011824, -123.348669453419, the inspector observed that pole clearing was not completed per protocol. The inspector's observation is documented in Violation 2

⁷ Pacific Gas and Electric Company, "2023 Wildfire Mitigation Plan," Mar. 27, 2023. p. 535 [Online]. Available: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/2023-wildfire-mitigation-plan.pdf>

⁸ Pacific Gas and Electric Company, "2023 Wildfire Mitigation Plan," Mar. 27, 2023. p. 535 [Online]. Available: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/2023-wildfire-mitigation-plan.pdf>

photographs, which are attachments to this report. Photo numbers Item3GImg1, Item3GImg2, Item3IA1Img2, and Item3IA1Img3 depict overgrown blackberry within the 10 ft firebreak radius.

Energy Safety concludes that Violation 2 is Moderate because of these facts:

1. Pacific Gas and Electric Company reported pole clearing was completed at this location.
2. Dense blackberry growth is inside the pole's 10 ft firebreak radius.
3. Blackberry bushes are a brush vegetation.
4. The vegetation density is moderate.

Exhibits

Exhibit A: Photo Log

Structure ID: 121593291

Violation 1



Item1Gimg1: Pole ID.



Item1Gimg2: Overall pole.



Item1Gimg3: View of wood pallets in foreground within 10 ft firebreak radius of pole.



Item1IA1img1: Other view of wood pallets within the 10 ft firebreak radius of pole.

Structure ID: 121469072

Violation 2



Item3GImg1: Pole ID.



Item3GImg2: Overall pole.



Item3IA1img2: Heavy blackberry growth within the 10 ft firebreak radius of pole.



Item3IA1img3: Large angle view of heavy blackberry growth within the 10 ft firebreak radius of pole.