



November 8, 2024

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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) conducted an inspection on September 11, 2024 of work completed by Pacific Gas and Electric (PG&E) in High Fire Threat District (HFTD) Tier 2 near the city of Mariposa, California in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a violation as described below.

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.2.2.2.4 Tree Removal Inventory (TRI), PGE failed to adhere its protocol of wood and slash management. Energy Safety considers this violation to be in the “Moderate” risk category.

Energy Safety provided the initial findings and supporting information regarding this violation to PG&E on September 17, 2024. Based on the information provided to PG&E before Energy Safety issued this Notice of Violation (NOV), PG&E remediated the violation on September 25, 2024 and provided photographs to Energy Safety documenting the remediation. Energy Safety reviewed the photographs and determined that PG&E adequately completed the work. As a result, Energy Safety considers the violation closed and no further action is required by PG&E.

If you have any questions regarding the enclosed inspection report, please contact me or Elizabeth McAlpine at Elizabeth.McAlpine@energysafety.ca.gov.

Sincerely,

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INSPECTION REPORT

Overview

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), 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.

Energy Safety designated this violation as moderate risk. PG&E has since remediated the violation. This violation is considered closed, and no further action is needed of PG&E.

Inspection Summary

The inspection location and WMP initiative summary is included in Table 1. The WMP inspection violation is included in Table 2.

Table 1: Inspection Location and WMP Initiative Summary

Electrical Corporation:	Pacific Gas and Electric
Report Number:	ESD_PGE_RIB_20240911_1355
Inspector:	Ramzi Ibrahim
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety inspected the locations based on PGE’s Q2 QDR.
Relevant WMP Initiative(s):	8.2.3.2 Wood and Slash Management
Date of inspection:	September 11, 2024
City and/or County of Inspection:	Mariposa, CA
Inspection Purpose:	Assess the accuracy of PG&E’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

Table 2: WMP Inspection Violation

Violation #	Structure ID	VMP ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Correction Timeline	Violation Description
Violation 1	N/A	VP_BC125-H01_1632349_2020	37.523551, -120.004405	Tier 2	8.2.3.2 Wood and Slash Management	Adherence to Protocol	Moderate	NA	Failure to manage slash.

Inspection Findings

Violation:

Relevant Requirements:

PG&E's WMP initiative 8.2.3.2 Wood and Slash Management states "...Utility work on vegetation creates debris and wood products which, if left unmanaged, can become fuel for wildfire. PG&E is required to reduce or adjust live fuels as they are generated from programs developed to comply with PRC [Public Resources Code] 4293, General Order 95 Rule 35 and Pub. Util. Code [Public Utility Code] 8386."¹

PG&E's WMP initiative continues by stating, "PG&E's VM [vegetation management] Programs define debris as material less than 4 inches in diameter and large wood as material greater than 4 inches in diameter.... Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations...."²

PG&E lists the following governing standard for its slash management program, "Best Management Practices (BMP) for Vegetation Management Activities (TD-7102P-01-JA01)."³ PG&E's protocol TD-7102P-01-JA01 states, "Woody debris created by chipping, lop and scatter, or brush mowing operations must be left at an average depth of less than 18 inches from the ground surface unless otherwise specified in an easement or land owner agreement."⁴

Finding:

Energy Safety concludes that Violation 1 is "Moderate" because the slash pile is over 18-inches in height, creating a potential fuel source for wildfire.

At VMP ID VP_BC125-H01_1632349_2020 near GPS coordinates 37.523551, -120.004405, PG&E reported it completed work under its TRI program. PG&E's Q2 data reports that its crews removed a gray pine, 54 feet tall and 17 inches in diameter on June 5, 2024. Energy Safety's inspector observed slash, wood chips, and woody debris from a gray pine (*Pinus sabiniana*), most of which appeared to have been felled and left in place. Additionally, the inspector observed a pile of slash debris was higher than 18 inches, and which was approximately 26 inches at the highest point. The inspector's observation is documented in Violation 1

¹ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 277
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed Oct. 16, 2024).

² PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed Oct. 16, 2024).

³ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed Oct. 16, 2024).

⁴ Pacific Gas and Electric Company. (n.d.). *General best management practices for all VM* (TD-7102P-01-JA01) (Rev. 1, Jan. 6, 2022), p. 12
(<https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-7102p-01-ja01-general-best-management-practices-for-all-vm.pdf>, accessed Oct. 16, 2024).

photographs, which are exhibits to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, depict a slash pile over 18-inches in height, and Item1IA1Img3, Item1IA1Img4 depict other slash, chips and woody debris associated with PG&E's work.

Energy Safety sent PG&E Data Request (DR) 258 on September 17, 2024, inquiring about the vegetation management activities at the site. PG&E's response to the data request confirmed that the slash, chips and woody debris was associated with VMP ID VP_BC125-H01_1632349_2020.

Since Energy Safety's inspection, PG&E conducted a field visit on September 23, 2024, and completed the clean-up and disposal of wood and slash at 5549 Gold Creek Lane by September 25, 2024. Therefore, Energy Safety considers violation ESD_PGE_RIB_20240911_1355 closed. No further action from PG&E is required in response to this violation.

Exhibits

Exhibit A: Photo Log

VMP ID: VP_BC125-H01_1632349_2020

Violation 1



Item1Gimg1: Photo of the pile of slash and wood debris and other debris.



Item1Gimg2: Photo of the pile of slash and woody debris and the surrounding area.



Item1G1mg3: Photo of the area near the pile of slash and woody debris. The pile is not depicted in the photograph.



Item1IA1mg1: Pile of slash and woody debris is at least 18 inches in height and is approximately 26 inches in height in some places. Photograph taken from the east side of the pile.



Item1IA1mg2: Pile of slash and woody debris is at least 18 inches in height and is approximately 26 inches in height in some places. Photograph taken from the east side of the pile.



Item1IA1Img3: Woody debris adjacent to the slash pile in Item1IA1Img1 to the north.



Item1IA1Img4: Other photograph of slash and woodchips near the slash pile in Item1IA1Img1.