

January 9, 2025

Sheryl Bilbrey  
Environmental Science Division  
Office of Energy Infrastructure Safety  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Reference: Energy Safety-ID: NOV ESD\_PGE\_RIB\_20241112  
Notice of Violation: Government Code § 15475.1 and the California Code of Regulations, Title 14,  
Division 17 § 29302(b)(2)

Dear Sheryl:

This letter is in response to the above referenced Notice of Violation (NOV) dated December 10, 2024, (NOV Letter) regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's 2024 Wildfire Mitigation Plan Initiatives in the vicinity of the city of Placerville, California in High Fire Threat District (HFTD) Tier 2 on September 6, 2024.

Energy Safety based its compliance assessment on the following statute and code sections:

**California Government Code Section 15475.1**, states:

- (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.*

**California Code of Regulations, Title 14, Section 29302(b)(2), "Investigations, Notices of Defect and Violation, and Referral to the Commission"** states in part:

*"The Director may designate a compliance officer to consider the findings of any investigation. The compliance officer may issue any of the following:*

...

*(2) Notice of violation, identifying noncompliance with an approved Wildfire Mitigation Plan or any law, regulation, or guideline within the authority of the Office."*

Energy Safety's September 6, 2024, and November 12, 2024, inspections identified the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.2.2.2.2 Distribution Second Patrol (VM-17) near coordinates 38.724635, -120.806162, PG&E failed to adhere to its protocol of removing dead or dying trees within 180 days of identification. Energy Safety considers this violation to be in the "Moderate" risk category.

**Response**

PG&E concurs with Energy Safety's observation and does not challenge this Notice of Violation.

Internal processing of this work took 182 days following the May 2, 2024, inspection that occurred under our Second Patrol Program. Following this timeframe, on November 1, 2024, we submitted a permit application with the California Department of Transportation (Caltrans) to authorize completion of this work. As of January 9, 2025, this application and permit are still pending approval/authorization from Caltrans.

We plan to release work and expedite the mitigation of these trees upon receiving the approved permit from Caltrans.

A detailed Corrective Action Program (CAP) item, #130108730, has been created to ensure guidance and monitoring functions are strengthened to avoid recurrence of this type of delay in the future.

Please do not hesitate to contact me at [jerrod.meier@pge.com](mailto:jerrod.meier@pge.com) if you have any questions regarding this matter.

Sincerely,

Jerrod Meier,  
Director, Electric Regulatory Compliance

cc: Sheryl Bilbrey, Program Manager, Office of Energy Infrastructure Safety  
Elizabeth McAlpine, Program and Project Supervisor, Office of Energy Infrastructure Safety  
Angela Sanford, Vegetation Management, PG&E