

January 23, 2025

Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Reference: Energy Safety-ID: CAD_PGE_RMA_20240820_1524
Notice of Violation: Government Code § 15475.1 and the California Code of Regulations, Title 14,
Division 17 § 29302(b)(2)

Dear Patrick:

This letter is in response to the above referenced Notice of Violation (NOV) dated December 24, 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 Oroville, California in High Fire Threat District (HFTD) Tier 2 on August 20, 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 August 22, 2024, inspections identified the following violation:

Violation 1:

PG&E's WMP states the following regarding initiative number 8.1.2.10.5 - Non-Exempt Expulsion Fuses, "This program reduces the consequence of potential ignitions by replacement and/or removal of nonexempt fuses. In general, the risk of ignition associated to a fuse on a line is reduced through the complete removal and/or replacement of non-exempt equipment with exempt equipment."

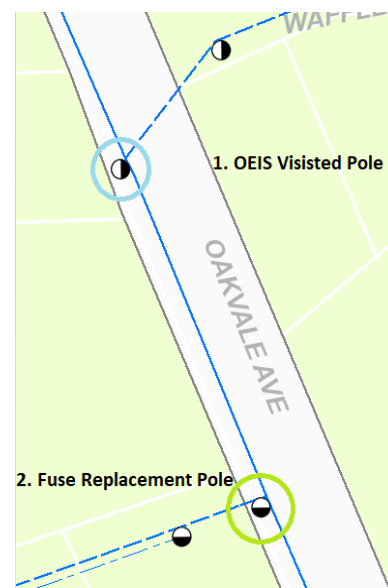
Version 3.1 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2023 WMP initiatives: "Electrical corporations must ensure location accuracy in their [geographic information system] data submissions..."

Finding: On pole ID 154531, Grid Hardening ID 31637844, and at 390 Oakvale Ave, Oroville, CA, 95966, USA, 39.49474771757241, -121.49056626368974, the inspector observed that both fuses in place were non-exempt expulsion fuses.

Response

PG&E disagrees with Energy Safety's data quality finding and contests this Notice of Violation.

QDR 2023 Q4 data did not include the location Energy Safety visited as a non-exempt fuse replacement. The pole location provided in the QDR report did have the non-exempt fuses replaced with exempt fuses and is identified with a green circle in Graphic 1. Based on the GIS location data, as well as, the photos provided as part of the Notice, it appears that the subject pole visited by Energy Safety personnel is one span northwest of the subject pole where work was performed. This pole is identified with a blue circle in Graphic 1. The non-exempt fuses at the visited pole were not replaced with CALFIRE-exempt fuses at this location, nor does PG&E indicate it had been replaced. The configuration at the pole identified at 390 Oakvale Avenue, Oroville, California is not line protection. The configuration identified has non-exempt universal fuses used in conjunction with a transformer which is currently not in scope for initiative number 8.1.2.10.5.



Graphic 1: Equipment Locations

Please contact me at 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