



January 24, 2025

Jerrold Meier  
Director, Electric Compliance  
Pacific Gas and Electric Company  
300 Lakeside Drive  
Oakland, CA 94612

## NOTICE OF VIOLATION

Mr. Meier:

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 (PG&E) in accordance with its 2023 Wildfire Mitigation Plan (WMP) and determined the existence of a violation. Energy Safety therefore issues PG&E a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.<sup>1</sup>

On August 13, 2024, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Mariposa, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.1 – covered conductor installation - distribution, PG&E failed to provide accurate data in reporting that covered conductor installation was completed over nine spans, between ten poles (pole ID's 121479485, 121479578, 121479484, 121479483, 120128597, 121026973, 120771076, 110309725, 121075191 and 121075190), with a Grid Hardening ID 35374559. Energy Safety observed new bare conductor with upgraded pole equipment. Energy Safety issues a violation referencing to the first (pole ID 121479485) and last (pole ID 121075190) poles where covered conductor installation was reported completed.

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<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup>

This response shall be filed in the Energy Safety e-Filing system under the 2023 NOV Docket<sup>4</sup> 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.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [compliance@energysafety.ca.gov](mailto: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](mailto:Patrick.Doherty@energysafety.ca.gov)

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<sup>2</sup> Energy Safety Compliance Guidelines, pp. 3

<sup>3</sup> Energy Safety Compliance Guidelines, pp. 4-5

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

<sup>5</sup> Energy Safety Compliance Guidelines, p. 4

Cc:

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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.<sup>6</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>

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<sup>6</sup> Energy Safety Compliance Guidelines, p. 3



# 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
Report Number:	CAD_PGE_ATJ_20240813_1556
Inspector:	Anthony Trujillo
WMP Year Inspected:	2023
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	Covered conductor installation - distribution (2023 WMP initiative number 8.1.2.1)
Date of inspection:	August 13, 2024
City and/or County of Inspection:	Mariposa, Mariposa County
Inspection Purpose:	Assess the accuracy of Pacific Gas and Electric Companies QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

**Table 3: WMP Inspection Violation(s)**

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1 (first pole)	121479485	35374559	37.50958406441703, -119.8767608158294	Tier 3	8.1.2.1 - Covered conductor installation - Distribution	Data Accuracy	N/A	Inaccurate data provided for covered conductor installation - distribution.
Violation 1 (last pole)	121075190	35374559	37.5086188089469, -119.8688697542548	Tier 3	8.1.2.1 - Covered conductor installation - Distribution	Data Accuracy	N/A	Inaccurate data provided for covered conductor installation - distribution.

# Inspection Details

## **Violation 1:**

### **Relevant Requirement:**

PG&E's WMP states the following regarding initiative number 8.1.2.1 covered conductor installation - distribution:

1. "CC installation involves the replacement of bare overhead primary conductor (voltage between 2-21 kV) and associated framing with conductor that is insulated with abrasion-resistant polyethylene coating (generally referred to as "covered conductor" and occasionally as "tree wire"). Installing CC can help reduce the likelihood of faults, and by extension ignitions, due to line-to-line contacts, tree-branch contacts, and faults caused by animals. Installing CC on secondary lines has similar benefits as for primary lines."<sup>7</sup>

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:

1. "Electrical corporations must ensure location accuracy in their [geographic information system (GIS)] data submissions..."<sup>8</sup>

### **Finding:**

Energy Safety observed bare conductor with upgraded associated framing where PG&E reported covered conductor installation – distribution as completed.

PG&E reported covered conductor installation as complete on spans between ten poles with the following pole IDs:

- 121479485
- 121479578
- 121479484
- 121479483
- 120128597
- 121026973
- 120771076
- 110309725
- 121075191
- 121075190

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<sup>7</sup> Pacific Gas and Electric Company, "PG&E 2023-25 approved Wildfire Mitigation Plan," January 1, 2024, p. 397 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>

<sup>8</sup> Office of Energy Infrastructure Safety, "Data Guidelines, Version 3.1," February 17, 2023, p. 10 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>

A data accuracy violation is issued for the covered conductor work reported as complete between the following two poles and their associated Grid Hardening IDs:

1. Pole ID 121479485, Grid Hardening ID 35374559, at 4201-4215 Triangle Rd, Mariposa, CA, 95338, USA, 37.50958406441703, -119.8767608158294
2. Pole ID 121075190, Grid Hardening ID 35374559 at 4109 Triangle Rd, Mariposa, CA, 95338, USA, 37.5086188089469, -119.8688697542548

The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. For pole ID 121479485, photo numbers Item1GIImg1 and Item1IA1Img1 depict bare conductor and a new crossarm where covered conductor installation was reported as completed.

For pole ID 121026973 photo numbers Item2IA1Img1, Item2IA1Img2, and Item2IA1Img3 depict new bare conductor and the nearest pad mounted transformer box where covered conductor installation was reported as completed.

For pole ID 121075190 photo numbers Item3GIImg2, Item3IA1Img1, and Item3IA1Img2 depict bare conductor where covered conductor installation was reported as completed.

Energy Safety concludes that:

1. PG&E's 2023 Q4 QDR reported covered conductor installation (8.1.2.1) work as completed for nine spans between ten poles listed above.
2. Covered conductor installation was not observed for the nine spans between ten poles listed above.





# Exhibits

Exhibit A: Photo Log

Violation 1

Structure ID: 121479485

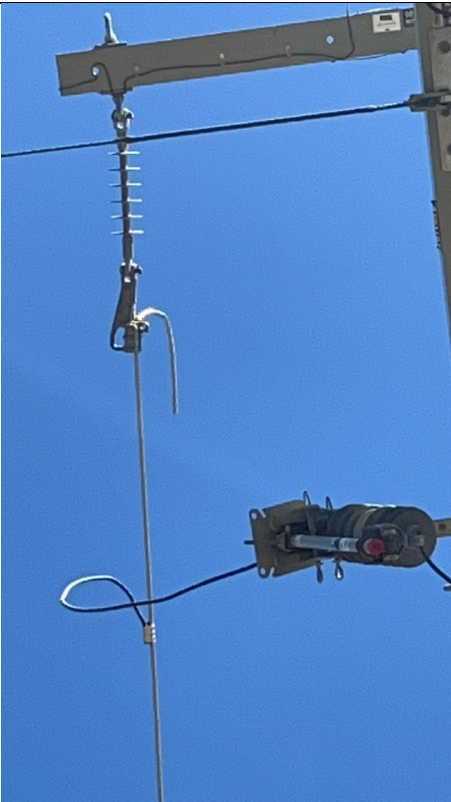
 A photograph showing a tall wooden utility pole standing in a rocky, scrubby landscape under a clear blue sky. The pole has several cross-arms and wires attached to it.	 A close-up photograph of the wooden pole. A yellow identification tag is attached to the pole with two screws. The tag contains the number '121479485' and a barcode. Below the tag, a metal band is wrapped around the pole with the number '248418' embossed on it.
<p><b>Item1Gimg1:</b> Overall pole south view</p>	<p><b>Item1Gimg2:</b> Pole ID</p>



**Item1GImg3:** Abandoned dead end insulator



**Item1GImg4:** Abandoned triplex insulator lying within vegetation



**Item1IA1Img1:** New bare wire, crossarms, and cut-out



**Item1IA1Img2:** South view



**Item1IA1Img3: West view**



**Item1IA1Img4: East view**

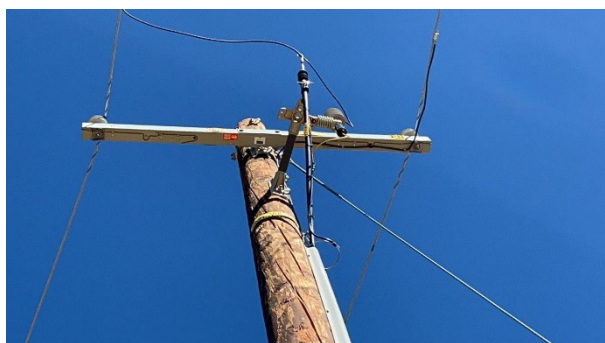
Structure ID: 121026973



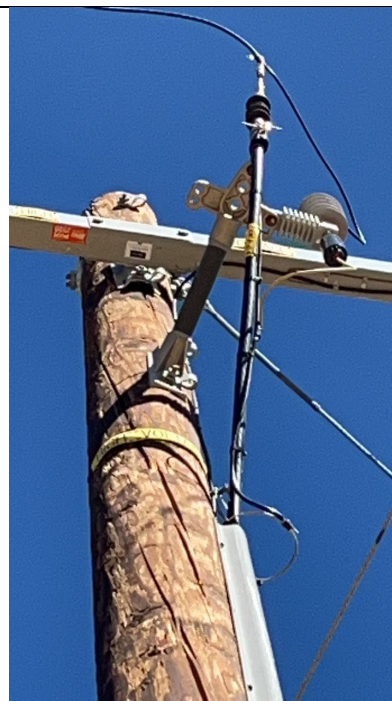
Item2GImg1: Pole ID



Item2GImg2: Overall pole with riser and underground pad mounted transformer in background



Item2IA1mg1: Bare conductor with new crossarms and insulators



Item2IA1mg2: Riser



**Item2IA1mg3:** Nearest pad mounted transformer

Structure ID: 121075190



Item3GImg1: Pole ID



Item3GImg2: Overall pole east view



Item3GImg3: Equipment at base of pole



Item3IA1Img1: Bare conductor



**Item3IA1Img2:** Overall north view



**Item3IA1Img4:** North view



**Item3IA1Img3:** Planted flags south of pole