



February 21, 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_CYA_20241107_1023
Notice of Violation: Government Code 326 § 15475.1 and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2)

Dear Mr. Doherty:

This letter is in response to the above referenced Notice of Violation (NOV) dated January 24, 2025, (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 Santa Cruz, California in HFTD Tier 3 on November 7th, 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 November 7th, 2024, inspections identified the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.5 - Non-Exempt Expulsion Fuses, PG&E failed to adhere to data accuracy on Grid Hardening ID 31520787, at coordinates 37.003975360585265, -121.97733237663908.

Response

PG&E agrees with the Energy Safety data quality finding and does not challenge this Notice of Violation, dated January 24, 2025.

The non-exempt expulsion fuses were not replaced with CALFIRE-exempt expulsion fuses, and this was inaccurately reported in Quarterly Data Report (QDR) for Quarter 2 of 2024.

This location had the intended equipment change to a CAL FIRE-exempt configuration completed after the Quarter 2 QDR was submitted. The exempt configuration was field verified with photo documentation on January 10, 2025.

PG&E will evaluate this data quality finding through Corrective Action Program (CAP) item #130795016.

Please contact me at jerrod.meier@pge.com if you have any questions regarding this matter.

Sincerely,

Jerrold 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