

February 20, 2025

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

RE: Energy Safety-ID: NOV_CAD_PGE_RMA_20241009_1010
Notice of Violation: Government Code § 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 21, 2025, (NOV Letter) regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2024 Wildfire Mitigation Plan initiatives in the vicinity of the city of Oakland, California, in High Fire Threat District (HFTD) Tier 2, on October 9, 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 October 9, 2024, inspection identified the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.5 - Non-Exempt Expulsion Fuses, on pole ID 110517663, Grid Hardening ID 31661651, at 4101 Mountain View Ave, Oakland, CA, 94605, USA, 37.782354, -122.174886, the inspector observed that no fuses were installed in the cutouts.

Response

PG&E respectfully disagrees with the Energy Safety data quality finding and challenges this January 21, 2025, Notice of Violation (NOV).

The non-exempt expulsion fuses were properly replaced with CAL FIRE-exempt Type E Power Fuses and accurately reported in Quarterly Data Report (QDR) for Quarter 2 of 2024. Thus, this location did receive an equipment change to a CAL FIRE-exempt configuration, contrary to the assertions in the NOV.

The cutouts observed as empty are Part 63H and only accept exempt Type E fuses. These cutouts and the exempt fuses are documented in image "item1IA1Img1" in Energy Safety's NOV.

The exempt fuses are shown hanging on the poles steps and conform to PG&E guidance document 15225 (1.C.1) for care and handling of Type E Power fuses. As shown in Image 1 and Image 2 below, both the Part63H cutout and the Type E Power Fuse have distinct features that distinguish them from Part 44H cutouts and the non-exempt universal fuses they can accept. Part63H cutouts are noticeably larger than Part 44H cutouts and the Type E Power Fuses have an oblong ring to support installation and removal. Another identification characteristic is the cap installed on the bottom of the fuse and the absence of a visible fuse element exiting the fuse holder.



Figure 16
Part 63H



Figure 1
Parts 44H and 44HSB

Image 1: Part 63H cutout with CalFire Exempt Type E Power fuse (Labeled Figure 16)

Image 2: Part 44H Cutout with Non-Exempt Universal Fuse (Labeled Figure 1)

In contrast, Part 44H cutouts are smaller than Part 63H and universal fuses have a round pull ring and a visible fuse element visible exiting the bottom of the fuse holder. The excerpt below details the care and handling of Type E power fuses.

Cutouts, Fuses, and Disconnects for Overhead Distribution Lines

Care and Handling of Type E Power Fuses

This applies to all sizes of Type E Power fuses from Table 9

1. Power fuses are manufactured for outdoor use; however, proper care and storage of the fuse is critical.
 - A. **ALWAYS STORE** fuses in as dry an environment as possible.
 - B. **NEVER LEAVE** fuses in standing water.
 - C. **DO NOT LEAVE** fuses hanging in the open position.
 1. IF fuse must be left open for an extended period, **THEN HANG** it on pole step.
 - D. **LEAVE** fuses in the protective packaging until installation – this will prevent any water ingress, even if stored in a truck bin (see Figure 17).
2. IF it is unknown whether a power fuse has been exposed to standing water, **THEN DISCARD** the fuse for safety and fire prevention reasons.

Image 3: Screen capture of PG&E Document 15225 with guidance for Type E Power Fuse placement when not in operation.

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