



March 21, 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 2024 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.¹

On January 16, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Jackson, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.5 - Non-Exempt Expulsion Fuses, PG&E failed to complete work on pole ID 121702867, Grid Hardening ID 31658288, at coordinates 38.36037254723159, -120.76546862422926. Energy Safety considers this completeness violation to be in the Minor risk category.

¹ 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.² 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.³

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket⁴ 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.⁵ Requests for informal conference with Energy Safety must be e-mailed to 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
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Cc:

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² Energy Safety Compliance Guidelines, pp. 3

³ Energy Safety Compliance Guidelines, pp. 4-5

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV>

⁵ Energy Safety Compliance Guidelines, p. 4

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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 1.⁶

Table 1. Risk Category and Correction Timelines

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

⁶ 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_CYA_20250116_1153
Inspector:	Cecilia Yaniz
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.10.5 – Non-Exempt Expulsion Fuses
Date of inspection:	January 16, 2025
City and/or County of Inspection:	Jackson, Amador County
Inspection Purpose:	Assess the accuracy of PG&E’S 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	121702867	31658288	38.36037254723159, -120.76546862422926	Tier 2	8.1.2.10.5 - Non-Exempt Expulsion Fuses	Completeness	Minor	Failed to complete work on non-expulsion fuse replacement.

Inspection Details

Violation 1

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.1.2.10.5 - Non-Exempt Expulsion Fuses:

1. "This program reduces the consequence of potential ignitions by replacement and/or removal of non-exempt 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."⁷

Finding:

On pole ID 121702867, Grid Hardening ID 31658288 at 379-325 New York Ranch Road, Jackson, CA 95642, USA, 38.36037254723159, -120.76546862422926, the inspector observed that the fuses were not attached to the cutouts. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GImg1, Item1GImg2, Item1IA1Img1, Item1IA1Img2 depict incomplete installation of CalFire-exempt fuses. PG&E reported that work on WMP initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses were completed at this location.

Energy Safety concludes that Violation 1 is Minor because of these facts:

1. The CalFire-exempt fuses were not attached to the cutouts.



⁷ Pacific Gas & Electric Company, "PG&E 2023-25 Approved Wildfire Mitigation Plan," January 8, 2024, p. 459. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 121702867

Violation 1

 A photograph showing a wooden utility pole standing on a grassy hillside next to a paved road. The pole has several power lines attached to it. The background shows a clear blue sky and some trees.	 A close-up photograph of a wooden utility pole. The pole is dark brown and has several yellow bands wrapped around it. A yellow label with the number '121702867' is visible near the top. The background is a clear blue sky.
<p>Item1GImg1: Overall Pole</p>	<p>Item1GImg2: Pole ID</p>



Item1IA1Img1: Empty fuse cutouts



Item1IA1Img2: Hanging CalFire-exempt Fuses