



April 17, 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_IAG_20250128_1059
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 March 21, 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 Nevada City, California in HFTD Tier 3 on January 28th, 2025.

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 January 28th, 2025, 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 complete work on pole ID 121416404, Grid Hardening ID 31659456, at coordinates 39.25547389666318, -120.96284311853148. Energy Safety considers this completeness violation to be in the Minor risk category.

Response

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

The cutouts observed are empty Part 44 cutouts. Solid Blade disconnects are hanging on pole steps consistent with internal guidelines. Although Solid Blade devices are non-exempt, the current operations of these disconnects aligns with our 2024 WMP in section “*8.1.2.10.5 Non-Exempt Expulsion Fuses*” and is accurately reported in Quarterly Data Report (QDR) for Quarter 3 of 2024. Thus, this location is not committed to an equipment change to a CAL FIRE-exempt configuration, per the WMP narrative and initiative description.

The cutouts observed are empty Solid Blades disconnects. These cutouts and the non-exempt devices are documented in images “*Item11A11mg1*” and “*Item11A11mg2*” in Energy Safety's NOV.

8.1.2.10.5 Non-Exempt Expulsion Fuses

Utility Initiative Tracking ID: GH-10

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. Fuses are intended to protect the main line of the distribution feeder from faults occurring on the laterals.

Impact of the Activity on Wildfire Risk

The replacement of non-exempt equipment with exempt equipment reduces ignition risk because the exempt equipment does not generate arcs and/or sparks during normal operation. When planning non-exempt fuse replacement, engineers conduct coordination studies to ensure protective devices are adequate to operate during the maximum available fault current and ensure that devices will properly operate in sequence to isolate the fault and minimize customer impact. In most cases, coordination is not interrupted when replacing non-exempt fuses with exempt equipment as described in this initiative.

Occasionally, when replacing existing non-exempt fuses with exempt fuses, the exempt fuse will disrupt the protection scheme for that circuit. In these cases, PG&E will be deploying Solid Blade switches to support operational flexibility and protect coordination. Even though Solid Blades are currently non-exempt devices, this strategy allows PG&E to eliminate the non-exempt fuse devices that operate automatically and hence pose a higher ignition risk. PG&E standard requires a crew with a QEW operator to be present at the site when a Solid Blade is operated. Additionally, the operator uses a load breaking tool when operating the switch, which diverts the load current through the load buster tool and mitigates the chances of a spark.

PG&E is currently in the process of seeking exemption status for the Solid Blade switch. Until the exemption status is approved by CAL FIRE, PG&E will also continue to maintain a firebreak around the poles that have Solid Blade installation to provide additional control against any ignition risk. As of January 2023, PG&E is not aware of any ignitions that have been caused due to the operation of a Solid Blade.

Impact of the Activity on PSPS Risk

This program has minimal impact on reducing PSPS risk and impact. Most of the highest impact fuse devices have already been replaced with automated equipment such as LR and Fuse Savers.

Updates to the Activity

PG&E plans to maintain the 2022 pace of replacing expulsion fuses (~3,000 per year) prioritized based on WDRM v2 consequence, while factoring in potential impacts of EPSS on locations identified for replacement.

Image 1: Screen capture of PG&E's 2023-2025 Wildfire Mitigation Plan section 8.1.2.10.5 explaining our operational process for existing Solid Blade disconnects.

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

Sincerely,

Jerrod Meier,
Director, Electric Regulatory Compliance

cc: Yana Loginova, Program Manager, Office of Energy Infrastructure Safety
Shannon Downey, Program and Project Supervisor, Office of Energy Infrastructure Safety
Ivan Garcia, Inspector, Office of Energy Infrastructure Safety