



May 15, 2025

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## NOTICE OF VIOLATION

Mr. Jarrod 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 (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.<sup>1</sup>

On March 05, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Strawberry Valley in a High Fire Threat District (HFTD) Tier 3. The inspection report is enclosed herewith. Energy Safety found the following violations:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.2.2.2.3 VM for Operational Mitigations (VMOM), PGE failed to adhere to its protocol of wood and slash management near pole ID 121273918 near coordinates 39.55953300657906, -121.12117412164933. Energy Safety considers this violation for adherence to protocol to be in the "Moderate" risk category.

### Response Options

In accordance with Energy Safety Guidelines,<sup>2</sup> within 30 days from the issuance of this NOV, PG&E must provide a response informing Energy Safety of corrective actions taken or planned to remedy the above identified violation and prevent recurrence. Alternatively, should PG&E disagree with the NOV, PG&E must

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<sup>1</sup> Cal. Code Regs., tit. 14, section 29302(b)(2)

<sup>2</sup> Energy Safety Compliance Guidelines, pp 4-5

submit to Energy Safety a response stating it disagrees with the violation, the reason or justification for the disagreement and all supporting documentation.<sup>3</sup>

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket<sup>4</sup> and the associated file name(s) must begin with the NOV identification number provided above.

PG&E may also request an informal conference with Energy Safety's Environmental Science Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the 30-day response deadline.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [environmentalscience@energysafety.ca.gov](mailto:environmentalscience@energysafety.ca.gov), with a copy sent to [Akiko.Masuda@energysafety.ca.gov](mailto:Akiko.Masuda@energysafety.ca.gov). Pursuant to Government Code section 15475.4, if PG&E 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.

Pursuant to Public Utilities Code section 8389(g), Energy Safety may refer this matter to the California Public Utilities Commission for consideration of potential enforcement action.

Sincerely,



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

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

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



# INSPECTION REPORT

## Overview

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), 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.

Energy Safety has designated this a violation as “Moderate” risk. PG&E must correct the violation pursuant to the timeline provided in Table 1.<sup>6</sup>

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

Risk Category	Violation 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 Tier 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

The inspection location and WMP initiative summary is included in Table 2. The WMP inspection violation is included in Table 3.

***Table 2: Inspection Location and WMP Initiative Summary***

Electrical Corporation:	Pacific Gas and Electric
Report Number:	NOV_ESD_PGE_GCA_20250305_0926
Inspector:	Gary Candelas
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety inspected the locations based on PGE’s Q4 QDR.
Relevant WMP Initiative(s):	8.2.2.2.3 VM for Operational Mitigations (VMOM)
Date of inspection:	March 05, 2025
City and/or County of Inspection:	Strawberry Valley, California
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 Violations**

Violation #	Structure ID	VMP ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Correction Timeline	Violation Description
Violation 1	121273918	RX-03822886 & RX-03822885	39.55953300657906, -121.12117412164933	Tier 3	VM for Operational Mitigations (VMOM)	Adherence to Protocol	Moderate	2 months	Failure to manage slash

# Inspection Findings

## Relevant Requirement:

PG&E's WMP initiative 8.2.3.2 Wood and Slash Management states, "...Utility work on vegetation creates debris and wood products which, if left unmanaged, can become fuel for wildfire. PG&E is required to reduce or adjust live fuels as they are generated from programs developed to comply with PRC [Public Resources Code] 4293, General Order 95 Rule 35 and Pub. Util. Code [Public Utility Code] 8386."<sup>7</sup>

PG&E's WMP initiative continues, "PG&E's VM [vegetation management] Programs define debris as material less than 4 inches in diameter and large wood as material greater than 4 inches in diameter.... Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations...."<sup>8</sup>

PG&E lists the following governing standard for its slash management program, "Best Management Practices (BMP) for Vegetation Management Activities (TD-7102P-01-JA01)."<sup>9</sup> PG&E's protocol TD-7102P-01-JA01 states, "Woody debris created by chipping, lop and scatter, or brush mowing operations must be left at an average depth of less than 18 inches from the ground surface unless otherwise specified in an easement or land owner agreement."<sup>10</sup>

## Violation 1

### Finding:

Energy Safety considers Violation 1 "Moderate" because the slash pile is over 18 inches in height and located in HFTD Tier 3, creating a potential fuel source for wildfire.

At VMP ID RX-03822886 and RX-03822885 near coordinates 39.55953300657906, -121.12117412164933, PG&E reported completed work under its VMOM program. According to the PG&E's Q4 data reports, crews removed a Douglas fir (*Pseudotsuga menziesii*) on December 1, 2024, was 80 feet tall and 13 inches in diameter. Crews removed Ponderosa pine (*Pinus ponderosa*) on December 2, 2024, was 115 feet tall and 33 inches in diameter. Energy Safety sent PG&E Data Request (DR) OEIS-E-INP\_2024-PG&E-02 on March 25, 2025,

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<sup>7</sup> PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 277

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April. 2, 2025).

<sup>8</sup> PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April. 2, 2025).

<sup>9</sup> PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April. 2, 2025).

<sup>10</sup> Pacific Gas and Electric Company. (n.d.). *General best management practices for all VM* (TD-7102P-01-JA01) (Rev. 1, Jan. 6, 2022), p. 12

(<https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-7102p-01-ja01-general-best-management-practices-for-all-vm.pdf>, accessed Oct. 16, 2024).

inquiring about the vegetation management activities at the site. PG&E's response to the DR confirmed that the slash, chips and woody debris was associated with the removal of these 2 trees.

Energy Safety's inspector observed slash, wood chips, and woody debris from the Douglas fir and the Ponderosa pine, most of which appeared to have been felled and left in place. Additionally, the inspector observed a pile of slash debris that was higher than 18 inches. According to PG&E's protocol all slash management pile must be left at an average depth of less than 18 inches from the ground surface. The inspector's observation is documented in Violation 1 photographs, which are exhibits to this report. Photo numbers Item1IA1Img1, Item1IA1Img3, and Item1IA1Img5 depict a slash pile over 18 inches in height, and Item1GImg1, Item1GImg2, Item1IA1Img2, Item1IA1Img4, and Item1IA1Img6 depict several other slash piles, chips and woody debris associated with PG&E's work.



# Exhibits

## Exhibit A: Photo Log

**Structure ID:** 121273918

**Violation 1:**



**Item1G1mg1:** Photo of general area showing slash piles and woody debris near the removed Douglas fir stump.



**Item1G1mg2:** Another photo of the general area showing slash piles and woody debris near the removed Douglas fir stump.



**Item1IA1mg3:** Photo of the slash pile over 18 inches in height in the front.



**Item1IA1mg2:** Photo of distributed slash piles in wider view.





**Item1IA1Img5:** Same slash pile of closer view of photo of slash pile over 18 inches in height.



**Item1IA1Img6:** Photo of other slash piles and woody debris of the removed Douglas fir and the Ponderosa pine.