

May 23, 2025

Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Energy Safety NOV ID: ESD_PGE_MAZ_20250305_1026
Notice of Violation: Government Code § 15475.1 and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2)

Dear Ms. Bilbrey:

This letter is in response to the above referenced Notice of Violation (NOV) dated 4/23/2025, (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 completed per locations submitted in its 4th Quarter (Q4) Quarterly Data Report (QDR).

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."*

The NOV was identified from a 3/5/2025 inspection by Energy Safety in the vicinity of the city of Strawberry Valley, California, in High Fire Threat District (HFTD) Tier 3 of PG&E's Q4 QDR report for WMP Initiative 8.2.2.2.3 – VM for Operational Mitigations (VMOM), Utility Initiative VM-18:

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 100409103 near coordinates 39.558332, -121.125357. Energy Safety considers this violation for adherence to protocol to be in the "Minor" risk category.

The NOV was issued following confirmation that VMP ID RX-03781260, was completed in association with Utility Initiative VM-18 in Q4 2024 per PG&E's 3/25/2025 response to Energy Safety's 3/11/2025 Data Request (DR), OEIS-E-INP_2024-PG&E-02, Question #04.

Response

PG&E agrees with Energy Safety on this 4/23/2025 Notice of Violation (NOV).

As PG&E indicated in its 3/25/2025 response to OEIS DR OEIS-E-INP_2024-PG&E-02, Question 04, the woody debris and logs at (39.558298511540265, -121.12544057784656) off of Barton Hill Rd were in relation to the work performed for VM-18 for Vegetation Point RX-03781260 off of Barton Hill Road on 11/11/2024, as reported in PG&E's Q4 QDR.

The debris was generated by work performed by a subcontractor to PG&E's prime tree contractor, Mountain F Enterprises. The subcontractor was demobilized from the North Valley region approximately one month after work was completed at this location.

Mountain F Enterprises did not perform all the expected quality management and review of tree work in this area. While some limitations to perform these functions were impacted by inclement weather and snow following work completion, this debris pile should not have remained on site for an extended duration. This pile was left with the intention to chip and remove shortly after work completion.

Actions Taken:

- 1) Site Clean Up occurred on 05/08/2025 as shown in Image 1 below.



Image 1: Site conditions following removal of wood debris

2) Extent of Condition Evaluation:

Following the discovery of these conditions, PG&E conducted an audit at over 300 locations where this subcontractor performed work. This audit is ongoing but completed in this geographic area on 05/22/2025. This audit has identified 3 additional properties that will require similar follow-up actions and cleanup. Mountain F Enterprises was notified.

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

Sincerely,

Jerrod Meier,
Director, Electric Regulatory Compliance

cc: Akiko Masuda, Program Manager, OEIS Environmental Science Division (ESD)
Patrick Doherty, Program Manager, OEIS Compliance Assurance Division (CAD)
Elizabeth McAlpine, Program and Project Supervisor, OEIS