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July 14, 2025

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

RE: Energy Safety NOV ID: NOV_CAD_PGE_CYA_20241106_1049
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 June 13, 2025, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2024 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its First Quarter (Q1) 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."

Energy Safety's November 6, 2024, inspection identified the following violation:

Inspection of PG&E's WMP initiatives in the vicinity of the city of Mile 5.4 Hwy 236 N, Boulder Creek, CA, 95006, USA, California

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 142642, Grid Hardening ID 31659221 at coordinates 37.172680516295806, -122.1739655949791.

Response

PG&E respectfully disagrees that this is a violation of WMP target GH-10 but has taken corrective action to mitigate the fuses hanging from the cutouts that were identified by Energy Safety. PG&E notes that this is not a practice that is supported by PG&E's internal guidance. As described in the attachment titled "*DRU15913_Atch01_Guidance_Idle Facilities_CONF.pdf*," it is permitted to have "[o]pen jumper or cutouts with doors removed **if** the entire tap line is idle." Open cutouts are also permitted when fuses are properly stored as described in guidance document 015225, which is provided as attachment "*DRU15913_Atch02_015225_CONF.pdf*."

Equipment at this location was changed, including upgraded Part 64H cutouts, which only support non-exempt equipment consistent GH-10 initiative guidance. However, this location remains idle due to the residence and service point being significantly impacted by the 2020 CZU Complex wildfires in Santa Cruz County. The customers service agreements were terminated on August 15, 2020, and the property is still void of an active service agreement.

PG&E will be ready to provide service to the customer upon a permitted residential rebuild on the property but, until that time, the facilities remain de-energized.

Please do not hesitate to contact the undersigned at Jerrod.Meier@pge.com if you have any questions regarding this matter.

Sincerely,

Jerrod Meier,
Director, Electric Regulatory Compliance

cc:

Samuel Isaiah, Senior Utilities Engineer Specialist, Energy Safety
Yana Loginova, Program Manager, Energy Safety
Shannon Greene, Program Manager, Energy Safety
Ivan Garcia, Field Inspector, Energy Safety