

July 21, 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_LOK_20240911_1131
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 19, 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 September 11, 2024, inspection identified the following violation:

city of Los Gatos, CA, in High Fire Threat District (HFTD) Tier 3 of PG&E's Q1 QDR report for WMP Initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses, Utility Initiative GH-10:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.5 -Non-Exempt Expulsion Fuses on pole ID 146103, Grid Hardening ID 31658944, at 24152-24212 Santa Cruz Hwy, Los Gatos, CA, 95033, USA, 37.11868920121737, -121.97500711929922, the inspector observed that one of the CalFIRE-exempt fuses was not attached to the cutout, stating PG&E failed to complete work on non-expulsion fuse replacement.

Response

PG&E respectfully disagrees with the Energy Safety data quality finding and challenges this September 11, 2024, Notice of Violation (NOV).

The non-exempt expulsion fuses were properly replaced with a CAL FIRE-exempt Type E Power Fuses and accurately reported in Quarterly Data Report (QDR) for Quarter 1 of 2024. Thus, this location did receive an equipment change to a CAL FIRE-exempt configuration, contrary to the assertions in the NOV. It is the expected practice to hang open E fuses on a pole step to prevent them from being upside down and subjected to potential water intrusion from rain.

See the attached “*AFW_CampEvers_PM31658944_CONF.pdf*” work for the day

Also see attached “*CMCS_ASBUILT_31658944_CONF.pdf*” for the completed CMCS.

The cutouts observed as empty are Part 63H and only accept exempt Type E fuses. These cutouts and the exempt fuses are documented in image “item1IA1Img1” in Energy Safety’s NOV.

The exempt fuses are shown hanging on the poles steps and conform to PG&E guidance document 15225 (1.C.1) for care and handling of Type E Power fuses. As shown in Image 1 and Image 2 below, both the Part63H cutout and the Type E Power Fuse have distinct features that distinguish them from Part 44H cutouts and the non-exempt universal fuses they can accept. Part63H cutouts are noticeably larger than Part 44H cutouts and the Type E Power Fuses have an oblong ring to support installation and removal. Another identification characteristic is the cap installed on the bottom of the fuse and the absence of a visible fuse element exiting the fuse holder.



Figure 16
Part 63H



Figure 1
Parts 44H and 44HSB

*Image 1: Part 63H cutout with CalFire
Exempt Type E Power fuse (Labeled Figure
16)*

*Image 2: Part 44H Cutout with Non-Exempt Universal
Fuse (Labeled Figure 1)*

In contrast, Part 44H cutouts are smaller than Part 63H and universal fuses have a round pull ring and a visible fuse element visible existing the bottom of the fuse holder. The excerpt below details the care and handling of Type E power fuses.

OH: Cutouts and Fuses

Cutouts, Fuses, and Disconnects for Overhead Distribution Lines

Care and Handling of Type E Power Fuses

This applies to all sizes of Type E Power fuses from Table 9

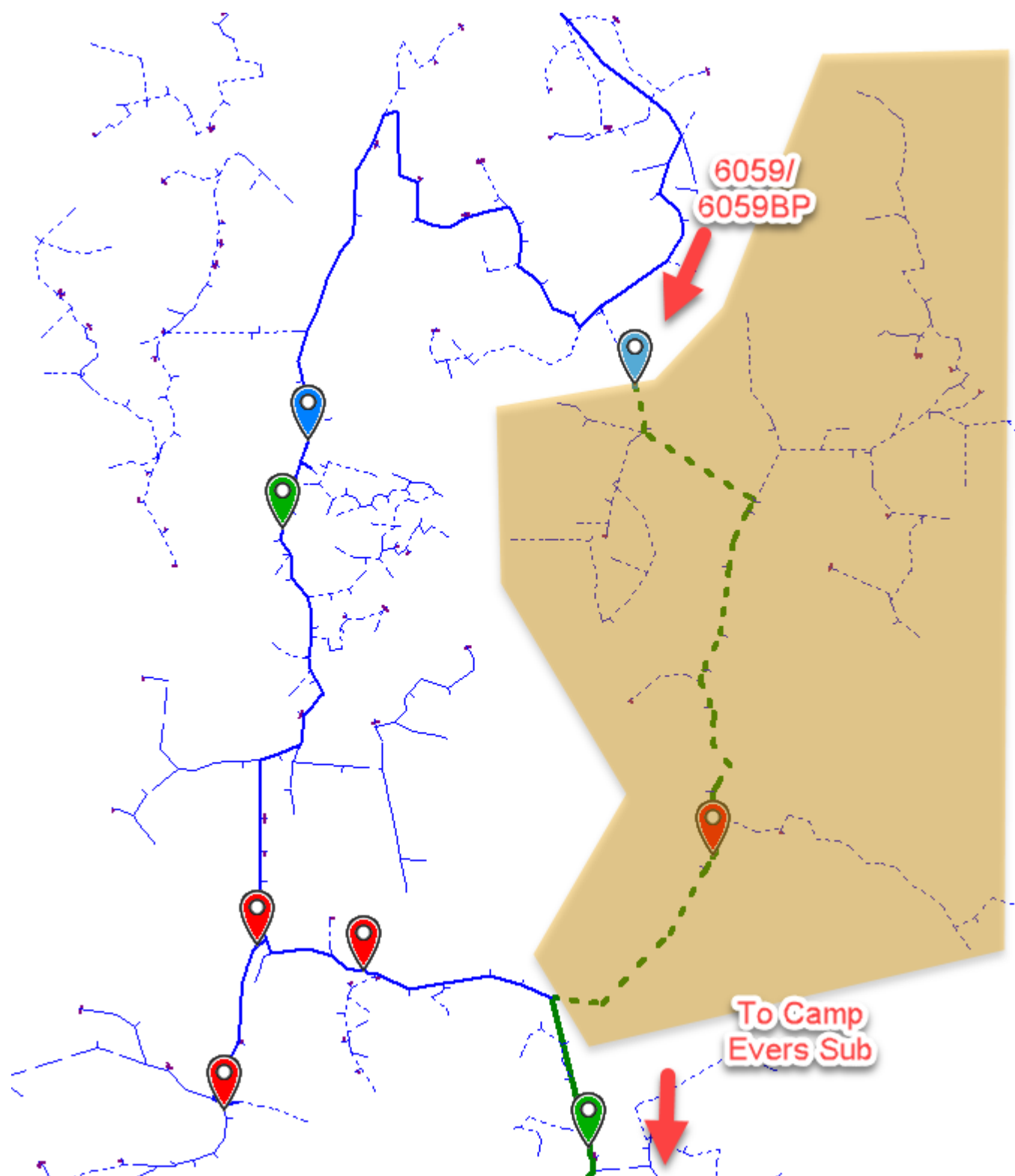
1. Power fuses are manufactured for outdoor use; however, proper care and storage of the fuse is critical.
 - A. **ALWAYS STORE** fuses in as dry an environment as possible.
 - B. **NEVER LEAVE** fuses in standing water.
 - C. **DO NOT LEAVE** fuses hanging in the open position.
 1. IF fuse must be left open for an extended period, **THEN HANG** it on pole step.
 - D. **LEAVE** fuses in the protective packaging until installation – this will prevent any water ingress, even if stored in a truck bin (see Figure 17).
2. IF it is unknown whether a power fuse has been exposed to standing water, **THEN DISCARD** the fuse for safety and fire prevention reasons.

Image 3: Screen capture of PG&E Document 15225 with guidance for Type E Power Fuse placement when not in operation.

This location is a normally open tie point on a local loop of Camp Evers 2106. The pre-existing 40T fuse was normally open, and the exempt replacement was normally open as well. This was a like-for-like replacement where everything stayed as previously configured once the replacement was complete. This is a normally open switching point by design.

This is what the circuit looks like:

- The indicated blue pin is the location of interest
- The green line is the path from the location to the source (Camp Evers 2106 CB)
- The orange highlighted zone is the one side of the local loop on the section



Regarding Engineering/Switching decisions:

- Section 2.5.7.G of TD-9001M Chapter 2 (Electric Design Manual) states:

G. Local loops usually are operated with a normal open that is located to split the load approximately in half. This optimizes reliability and facilitates coordination with the protective device. However, when required, protection at both sources of a local loop also must be capable of supplying the entire loop, without incurring an outage.

When the protection consists of fuses, a solid blade bypass is required for switching purposes.

When the protection consists of electronic devices, a bypass is not required because the electronic controls typically can be changed or cut out for switching purposes.

Engineering has the flexibility to optimize the circuit design based on local knowledge and informed judgement. Thus, this location may not specifically be the “approximate half” point, it serves a similar operational functionality of being able to serve the same local loop if needed and still provide protection via a fuse.

Please do not hesitate to contact our shared inbox at WSCComplianceMailbox@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