July 28, 2025

Joshua Jones
Vice President of Transmission & Distribution Operations
PacifiCorp
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#### NOTICE OF VIOLATION

Mr. Jones:

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 PacifiCorp (PC) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a violation. Energy Safety therefore issues PC 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 May 22, 2025, Energy Safety conducted an inspection of PC's WMP initiatives in the vicinity of the city of Yreka, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative Expulsion Fuse Replacement, PC failed to adhere to completeness on pole ID 624507.342102, Grid Hardening ID 7074439 at coordinates 41.70150548296, -122.646254858048. Energy Safety considers this completeness violation to be in the Minor risk category.

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

#### **Response Options**

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category. Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction 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.

Pursuant to Government Code section 15475.4, if the electrical corporation 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.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety's Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation's response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,

Patrick Doherty

Program Manager | Compliance Assurance Division

Office of Energy Infrastructure Safety

Patrick.Doherty@energysafety.ca.gov

Cc:

Joshua Jones, PacifiCorp

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Patrick Doherty

<sup>&</sup>lt;sup>2</sup> Energy Safety Compliance Guidelines, pp. 3

<sup>&</sup>lt;sup>3</sup> Energy Safety Compliance Guidelines, pp. 4-5

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

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

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## **INSPECTION REPORT**

## **Overview**

### **Inspection Categories**

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) or subsequent filing, 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.

### **Correction Timelines**

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.<sup>6</sup>

### Table 1. Risk Category and Correction Timelines

Risk Category	Violation and defect correction timeline
Severe	Immediate resolution
Moderate	<ul> <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 Tiers 2 or 3)</li> </ul>
Minor	12 months or resolution scheduled in WMP update

<sup>&</sup>lt;sup>6</sup> Energy Safety Compliance Guidelines, p. 3

# **Inspection Summary**

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

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

Electrical Corporation:	PacifiCorp				
Report Number:	CAD_PC_IAG_20250522_1008				
Inspector:	Ivan Garcia				
WMP Year Inspected:	2024				
Quarterly Data Report (QDR) Referenced:	Quarter (Q4)				
Inspection Selection:	Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of				
	the WMP initiatives and locations referenced in this report.				
Relevant WMP Initiative(s):	8.1.2.12 - Expulsion Fuse Replacements				
Date of inspection:	May 22, 2025				
City and/or County of Inspection:	Yreka, Siskiyou County				
Inspection Purpose:	Assess the accuracy of PacifiCorp's QDR data, completeness of its work, compliance with WMP requirements,				
	and compliance with its protocols.				

## Table 3: WMP Inspection Violation(s)

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	624507.3 42102	7074439	41.701505482 96, - 122.64625485 8048	Non- HFTD	Expulsion Fuse Replacement	Completeness	Minor	Failed to complete work on non-expulsion fuse replacement.

# **Inspection Details**

Violation 1

#### **Relevant Requirement:**

PC's WMP states the following regarding initiative number 8.1.2.12 - Expulsion Fuse Replacements:

 "This is a project to install new and CAL FIRE-approved non expulsion fuses including power fuses and current limiting fuses to replace existing expulsion fuse equipment with planned end date in 2024."

#### Finding:

On Pole ID 624507.342102, Grid Hardening ID 7074439 at Mile 47.1 Hwy 3, Yreka, CA, 96097, USA, 41.70150548296, -122.646254858048, the inspector observed that non expulsion fuses were not attached to the cutouts. The inspector's observation is documented in Violation 1 photographs, which are attached to this report. Photo number Item1IA1Img1 depicts incomplete installation non expulsion fuses. In the 2024 Q4 Quarterly Data Report submission, PC reported that work on WMP initiative 8.1.2.12 – Expulsion Fuse Replacements was completed at this location.

Energy Safety concludes there is a violation because of these facts:

- 1. Non expulsion fuses were not attached to the cutouts.
- 2. Three solid blade disconnect fuses (which are expulsion fuses) were installed.

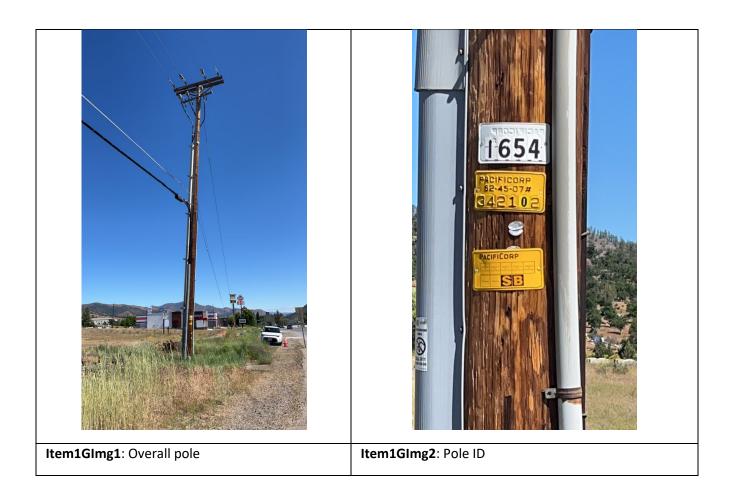
<sup>&</sup>lt;sup>7</sup> PacifiCorp, "2023-205 Wildfire Mitigation Plan -2025 Update." July 8, 2024, p. 162. [Online]. Available: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56990&shareable=true

# **Exhibits**

Exhibit A: Photo Log

**Structure ID:** 624507.342102

Violation 1





Item1IA1Img1: Three solid blade disconnect fuses (which are expulsion fuses) installed.