



August 7, 2025

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## NOTICE OF VIOLATION

Mr. Jerrod 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 2025 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 July 17, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Novato in High Fire Threat District (HFTD) Tier 3, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.3.1 Pole Clearing, PG&E failed to adhere to its protocol at pole ID120511951 near coordinates 38.085315291612744, -122.591955114. Energy Safety considers this violation for adherence to protocol to be in the "Moderate" risk category due to the presence of dry grass which provides a fuel bed of flammable vegetation.

### 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 2025 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  
Program Manager | Environmental Science Division  
Office of Energy Infrastructure Safety  
[Sheryl.Bilbrey@energysafety.ca.gov](mailto:Sheryl.Bilbrey@energysafety.ca.gov)

Cc:

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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=2025%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 violation as a “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_RGA_20250717_0951
Inspector:	Ricardo Garcia
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 1 (Q1)
Inspection Selection:	Energy Safety inspected the locations based on PGE’s Q1 QDR.
Relevant WMP Initiative(s):	8.2.3.1 Pole Clearing
Date of inspection:	July 17, 2025
City and/or County of Inspection:	Novato, CA
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 Violation**

Violation #	Structure ID	VMP ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Correction Timeline	Violation Description
Violation 1	120511951	Proj-Pole-1866264	38.085315291612744, -122.591955114	Tier 3	8.2.3.1 Pole Clearing	Adherence to Protocol	Moderate	2 Months	Failure to maintain required radial firebreak of 10 feet around pole 120511951.

# Inspection Findings

## Violation 1:

### **Relevant Requirement:**

PGE's WMP initiative number 8.2.3.1 Pole Clearing states, "PG&E performs removal/clearing of vegetation around select Transmission and Distribution poles and towers in accordance with PRC Section 4292, to maintain a firebreak of at least 10 ft in radius (out from the pole) up to 8 ft up from the ground per Title 14 CCR 1254. These requirements apply in the SRA during designated fire season. PRC Section 4292 applies to SRA and has been adopted by Region 5 of the United States Forest Service (USFS), and mandates pole clearing requirements for equipment not otherwise exempted in Title 14 CCR 1255."<sup>7</sup>

### **Finding:**

Energy Safety considers Violation 1 as "Moderate" because of the presence of dry grass which provides a fuel bed of flammable vegetation.

At pole ID 120511951, near GPS coordinates 38.085315291612744, -122.591955114665, PG&E reported the completion of mechanical pole clearing on December 15, 2024, in the 2025 Q1 QDR data. However, the inspector observed that PG&E failed to adhere to its protocol of maintaining the required radial firebreak distance of 10 feet around the base of the pole. Dry vegetation was present from the base of the pole radiating in each direction within 10 feet. Additionally, the pole is located in HFTD Tier 3 within an SRA and is equipped with non-exempt split bolt connectors. Therefore, it falls under the requirement of PRC 4292, which mandates the removal of flammable vegetation within 10 feet of such poles. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GIimg1 and 1GIimg2 depict pole ID 120511951 and an overall view of the equipment on the pole. Photo numbers Item1IA1img1 and Item1IA1img2 show the non-exempt split bolts on the pole. Photo numbers Item1IA1img3 and Item1IA1img4 depict vegetation present within 10 feet of the pole.

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<sup>7</sup> PG&E's 2023-2025 WMP (Published February 13, 2025), p.687

URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true>, accessed July 25, 2025).

# Exhibits

## Exhibit A: Photo Log

**Structure ID:** 120511951

### Violation 1



**Item1GImg1:** Pole ID 120511951.



**Item1GImg2:** Equipment on the pole.



**Item1IA1Img1:** Non-exempt split bolt connectors on the pole.



**Item1IA1Img2:** Closer view of the non-exempt split bolt connectors on the pole.



**Item1IA1Img3:** Dry flammable vegetation within 10-foot radial distance of the pole.



**Item1IA1Img4:** Dry flammable vegetation within 10-foot radial distance of the pole.