



September 2, 2025

Daniel Kushner
Sr. Director – Electric Risk & Compliance
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

NOTICE OF VIOLATION

Mr. Kushner:

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 & Electric Company (PG&E) in accordance with its 2024 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.¹

On April 8, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the City of Los Gatos, 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 8.1.2.10.5 - Non-Exempt Expulsion Fuses, PG&E failed to adhere to data accuracy on pole ID GT 105595, Grid Hardening ID 31661650 at coordinates 37.22828560877868, -121.99130148338494.

¹ 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.² 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.³

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket⁴ 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.⁵ 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
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Cc:

Daniel Kushner, PG&E
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² Energy Safety Compliance Guidelines, pp. 3

³ Energy Safety Compliance Guidelines, pp. 4-5

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

⁵ 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 1.⁶

Table 1. Risk Category and Correction Timelines

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 2 months (in High Fire Threat District (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	<ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update

⁶ 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:	Pacific Gas & Electric Company
Report Number:	CAD_PGE_KSF_20250408_1326
Inspector:	Keyshawn Ford
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 4 (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):	8.1.2.10.5 - Non-Exempt Expulsion Fuses
Date of inspection:	April 8, 2025
City and/or County of Inspection:	Los Gatos, Santa Clara County
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(s)

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	GT 105595	31661650	37.228285608 77868, - 121.99130148 338494	Tier 2	8.1.2.10.5 - Non-Exempt Expulsion Fuses	Data Accuracy	N/A	Inaccurate data provided on non-exempt expulsion fuse replacement.

Inspection Details

Violation 1

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.1.2.10.5 - Non-Exempt Expulsion Fuses:

1. "This program reduces the consequence of potential ignitions by replacement and/or removal of non-exempt fuses. In general, the risk of ignition associated to a fuse on a line is reduced through the complete removal and/or replacement of non-exempt equipment with exempt equipment." ⁷

Version 4.0 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2024 WMP initiatives:

2. "Electrical corporations must ensure location accuracy in their [geographic information system] data submissions..." ⁸

Finding:

On Pole ID GT 105595, Grid Hardening ID 31661650 at 94 Hernandez Ave, Los Gatos, CA, 95030, 37.22828560877868, -121.99130148338494, the inspector observed no exempt fuses installed on the pole. The inspector's observation is documented in Violation 1 photographs, which are attached to this report. Photo numbers Item1IA1Img1 and Item1IA1Img2 depict a distribution pole with no exempt fuses present.

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

1. Exempt fuses were not observed on the pole.
2. Data provided by PG&E indicated that exempt fuses were installed at this pole.

⁷ Pacific Gas & Electric Company, "PG&E 2023-25 Approved Wildfire Mitigation Plan," January 8, 2024, p. 459. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>

⁸ Office of Energy Infrastructure Safety, "Data Guidelines, Version 4.0," March 3, 2025, p. 12 [Online]. Available: <https://efiling.energysafety.ca.gov/Search.aspx?docket=Data%20Guidelines>

Exhibits

Exhibit A: Photo Log

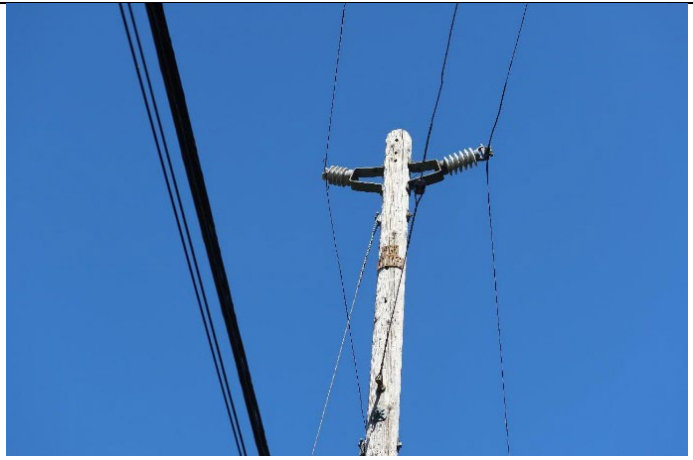
Structure ID: GT 105595

Violation 1

	
<p>Item1GImg1: Overall pole</p>	<p>Item1GImg2: Pole ID</p>



Item1IA1Img1: View of pole with no electrical equipment observed.



Item1IA1Img2: Closer view of pole with no exempt fuses installed.