



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 and 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 March 25, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Hat Creek, 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 8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor, PG&E failed to complete work on pole ID 013/251, Grid Hardening ID 74057080-6 at coordinates 40.816453, -121.366893. Energy Safety considers this completeness violation to be in the Minor risk category.

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
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.Doherty@energysafety.ca.gov

Cc:

Daniel Kushner, PG&E
DDK0@pge.com

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

Mandy Knockaert, PG&E

ARKN@pge.com

Wade Greenacre, PG&E

WAG9@pge.com

Electric Data Requests

ElectricDataRequests@pge.com

Cecilia Yaniz, Energy Safety

Cecilia.Yaniz@energysafety.ca.gov

Samuel Isaiah, Energy Safety

Samuel.Isaiah@energysafety.ca.gov

Yana Loginova, Energy Safety

Yana.Loginova@energysafety.ca.gov

Shannon Greene, Energy Safety

Shannon.Greene@energysafety.ca.gov

Compliance@energysafety.ca.gov



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	• Immediate resolution
Moderate	• 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	• 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 and Electric Company
Report Number:	CAD_PGE_CYA_20250325_1318
Inspector:	Cecilia Yaniz
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter Q4 (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):	8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor
Date of inspection:	March 25, 2025
City and/or County of Inspection:	Hat Creek, Shasta 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	013/251	74057080-6	40.816453, -121.366893	Tier 2	8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor	Completeness	Minor	Failed to complete work on transmission shunt splice install.

Inspection Details

Violation 1

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor on shunt splices:

1. "A conductor splice is a point of failure within a conductor span, due to factors such as corrosion, moisture intrusion, vibration, and workmanship variability. Certain types of splices, such as a twist splice, can have higher risk of failure compared to other splice types. A program has been initiated to install a shunt splice on top of the existing splice. This installation eliminates the splice as a single point of failure, as a failure of the original splice would not result in down conductor. Lines prioritized for this program are based on higher risk splice and wildfire consequence."⁷

Finding:

On Pole ID 013/251, Grid Hardening ID 74057080-6 at Pole Line Rd, Hat Creek, CA, 96040, 40.816453, - 121.366893, the inspector observed that no shunt splice covered the existing splice on one of the spans on the pole 013/251. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GIimg1, Item1IA1img1 and Item1IA1img2 depict incomplete installation of a shunt splice. For Grid Hardening ID 74057080-6, PG&E reported completed work under WMP tracking ID GH-06 at the location, with the Description of Work field reading "Shunt Splice Installation."

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

1. An existing splice was present on one of the spans on the pole 013/251.
2. No shunt splice was observed on top of the existing splice.

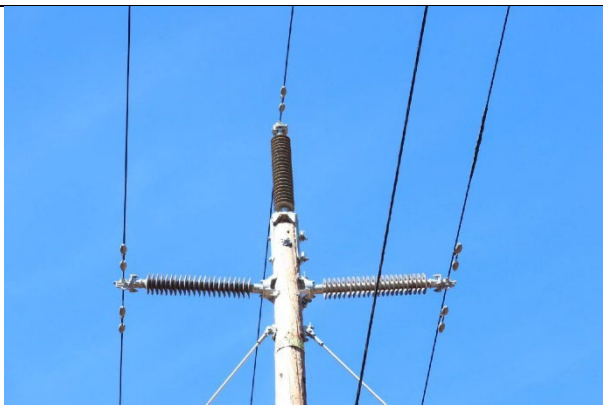
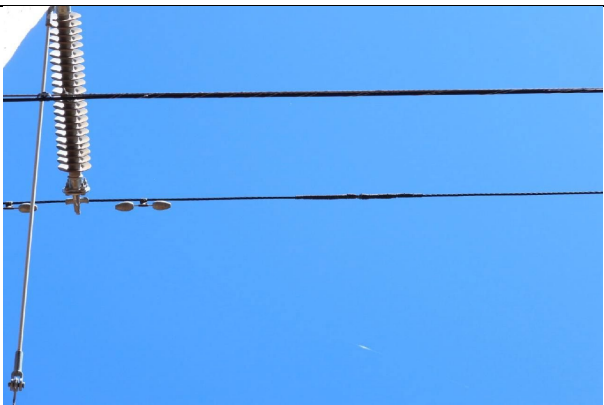
⁷ Pacific Gas & Electric Company, "PG&E 2023-25 Approved Wildfire Mitigation Plan," January 8, 2024, p. 437. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 013/251

Violation 1

	
Item1GImg1: Overall Pole and spans	Item1GImg2: Pole ID
	
Item1IA1Img1: Overview of splice location	Item1IA1Img2: Splice with no shunt splice installed