



September 17, 2025

Daniel Kushner
Sr. Director, Electric Regulatory 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 27, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Grass Valley, 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 complete work on pole ID 121670245, Grid Hardening ID 31658456 at coordinates 39.187828, -120.925855. 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:

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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 and Electric Company
Report Number:	CAD_PGE_RMA_20250327_0943
Inspector:	Romeo Marroquin Ajcac
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:	March 27, 2025
City and/or County of Inspection:	Grass Valley, Nevada 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	121670245	31658456	39.187828, -120.925855	Tier 3	8.1.2.10.5 - Non-Exempt Expulsion Fuses	Completeness	Minor	Failed to complete work on non-expulsion fuse replacement.

Inspection Details

Violation 1

Relevant Requirements:

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

PG&E construction standard 015225, which is presented in exhibition B, clarifies that the fuse observed by the inspector at the inspection location is required to have a red cap. The construction standard states "[l]eave red cap on for overhead installation."

Finding:

On pole ID 121670245, Grid Hardening ID 31658456 at 13700-13912 Greenhaven Ln, Grass Valley, CA, 95945, 39.187828, -120.925855, the inspector observed that one of the CalFire-exempt fuses was missing the red rain cap at the bottom of the fuse. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1IA1Img1, Item1IA1Img3, and Item1IA1Img4 depict one of two CalFire-exempt fuses missing its rain cap. Additionally, photo numbers Item1IB1Img1 and Item1IB1Img2 depict PG&E construction standards, which clarify that fuses such as the one observed by the inspector at the inspection location must have its red cap left in place for overhead installations. PG&E reported that work on WMP Initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses was completed at this location.

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

1. The CalFire-exempt fuse, which was part of an overhead installation, was missing its red cap.
2. PG&E's construction standards for the CalFire-exempt fuse observed at the inspection location require the presence of a red cap on overhead installations of the fuse.

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 S&C: Installation, Replacement, and Maintenance. (n.d.). Retrieved April 4, 2025. Available: <https://www.sandc.com/globalassets/sac-electric/documents/public---documents/sales-manual-library---external-view/instruction-sheet-252-550.pdf?dt=638175120911788028>

Exhibits

Exhibit A: Photo Log

Structure ID: 121670245

Violation 1



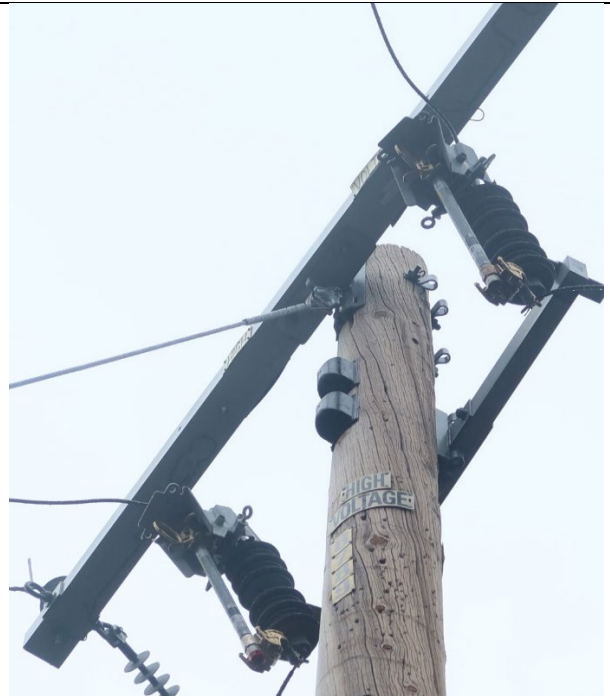
Item1IA1Img1: Overall Structure.



Item1IA1Img2: Pole ID.



Item1IA1Img3: CalFire-exempt fuse is missing bottom-mounted red rain cap.



Item1IA1Img4: Two CalFire-exempt fuses, one missing red rain cap (right).

Exhibit B: Photo Log

Construction Standard: 015225 - CUTOUTS, FUSES, AND DISCONNECTS FOR OVERHEAD DISTRIBUTION LINES

Violation 1

<div><div>Convenience Copy</div><div>OH: Cutouts and Fuses</div><div>Cutouts, Fuses, and Disconnects for Overhead Distribution Lines</div><div>Care and Handling and Installation of Type E Power Fuses</div><div>This applies to all sizes of Type E Power fuses from Table 9</div><div><div>1. Power fuses are manufactured for outdoor use; however, proper care and storage of the fuse is critical.</div><div>A. ALWAYS STORE fuses in as dry an environment as possible.</div><div>B. NEVER LEAVE fuses in standing water.</div><div>C. DO NOT LEAVE fuses hanging in the open position.</div><div>1. IF fuse must be left open for an extended period, THEN HANG it on pole step.</div><div>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).</div></div><div><div>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.</div><div>3. Only use hand tools to install Power E fuses' end fittings. Ensure that there is a parallel gap after installing the end fittings. Over tightening end fittings will prevent fuse to drop out.</div></div><div><div><div><div><div>Leave fuse in protective packaging until ready for installation</div><div>Leave red cap on for overhead installation</div></div><div><div>✓</div><div><div>Gap, clamp, parallel</div><div>Figure 18 Proper End Fitting Installation</div></div><div><div>✗</div><div><div>No gap, clamp not parallel</div><div>Figure 19 Improper End Fitting Installation</div></div></div></div><div>Figure 17 Fuse in Protective Packaging with Red Cap On</div><div>Rev. #26: 9/5/2024</div><div>015225 Page 19 of 21</div></div></div></div></div>	<div><div><div><div>Leave fuse in protective packaging until ready for installation</div><div>Leave red cap on for overhead installation</div></div><div><div>Figure 17 Fuse in Protective Packaging with Red Cap On</div></div></div></div> <div>Item1IB1Img1: PG&E construction standards call for the red cap to be attached for an overhead installation.</div>
	<div><div>Item1IB1Img2: Close-up view of PG&E construction standards.</div></div>