



September 17, 2025

Joshua Jones  
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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 21, 2025, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of the city of Mount Shasta, 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 Distribution Pole Replacement, PC failed to adhere to completeness on pole ID 06240004.289700, Grid Hardening ID 8077847 at coordinates 41.2883908520503, -122.308597826632. Energy Safety considers this completeness violation to be in the Minor risk category.

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<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.<sup>2</sup> 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](mailto: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  
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<sup>2</sup> Energy Safety Compliance Guidelines, pp. 3

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

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

<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	<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 Tiers 2 or 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

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_BKA_20250521_1503
Inspector:	Babak Kaviani
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter (Q3)
Inspection Selection:	Energy Safety viewed the contents of the Q3 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.3 Distribution Pole Replacement and Reinforcement
Date of inspection:	May 21, 2025
City and/or County of Inspection:	Mount Shasta, 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	06240004.2 89700	8077847	41.2883908520503, -122.308597826632	Tier 2	8.1.2.3 - Distribution Pole Replacement and Reinforcement	Completeness	Minor	Failed to complete work on distribution pole replacement.

# Inspection Details

## Violation 1

### **Relevant Requirement:**

PC's WMP states the following regarding initiative number 8.1.2.12 - Distribution Pole Replacement and Reinforcements:

1. "Pacific Power plans to mitigate the risk associated with wood poles by replacing them with more fire resilient materials."<sup>7</sup>

### **Finding:**

On pole ID 06240004.289700, Grid Hardening ID 8077847 at Volcanic Legacy Scenic Byway, Mount Shasta, CA, 96067, USA, 41.2883908520503, -122.308597826632, the inspector observed that the old pole adjacent to the newly replaced pole remained in use, with an attached riser carrying secondary conductors from the transformer mounted on the new pole. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GIimg1, Item1GIimg3, Item1IA1img1, and Item1IA1img2 depict incomplete replacement of a distribution pole. In the 2024 Q3 Quarterly Data Report submission, PC reported that work on WMP initiative 8.1.2.3 - Distribution Pole Replacement and Reinforcement was completed at this location.

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

1. A new pole was installed at the inspection location, next to an older pole.
2. The old pole remained in use to support a riser carrying secondary conductors.
3. Because the old pole remained in use to conduct electricity, it was not completely replaced by the new pole next to it.

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<sup>7</sup> PacifiCorp, "2023-2025 Wildfire Mitigation Plan – 2025 Update" July 8, 2024, p. 159. [Online]. <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56990&shareable=true>

# Exhibits

Exhibit A: Photo Log

Structure ID: 06240004.289700

Violation 1

 A photograph showing a tall utility pole against a clear blue sky. At the top of the pole, there is a large, messy nest made of sticks and twigs. The pole is surrounded by green trees and bushes. A yellow marker is visible on the ground near the base of the pole.	 A close-up photograph of a rusted metal utility pole. A yellow identification tag is attached to the pole. The tag has the text "PACIFICORP" at the top, followed by the numbers "06240004" and "289700" on separate lines. The background shows green trees and a clear blue sky.
<p><b>Item1GImg1:</b> Overall pole</p>	<p><b>Item1GImg2:</b> Pole ID</p>



**Item1G1mg3:** View of the newly replaced and the old distribution pole



**Item1IA1mg1:** The newly replaced distribution pole and the old pole still in use as a riser support



**Item1IA1mg2:** The newly replaced distribution pole and the old pole still in use as a riser support