

October 2, 2025

Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Energy Safety NOV ID: CAD_PGE_CYA_20250325_1318
Notice of Violation: Government Code § 15475.1 and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2)

Dear Mr. Doherty:

This letter is in response to the above referenced Notice of Violation (NOV) dated September 2, 2025, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2024 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Fourth Quarter (Q4) Quarterly Data Report (QDR).

Energy Safety based its compliance assessment on the following statute and code sections:

California Government Code Section 15475.1, states:

- (a) The office may determine that a regulated entity is not in compliance with any matter under the authority of the office. If necessary, the office may undertake an investigation into whether the regulated entity is noncompliant with its duties and responsibilities or has otherwise committed violations of any laws, regulations, or guidelines within the authority of the office.*
- (b) The office's primary objective is to ensure that regulated entities are reducing wildfire risk and complying with energy infrastructure safety measures as required by law.*

California Code of Regulations, Title 14, Section 29302(b)(2), "Investigations, Notices of Defect and Violation, and Referral to the Commission" states in part:

"The Director may designate a compliance officer to consider the findings of any investigation. The compliance officer may issue any of the following:

...

- (2) Notice of violation, identifying noncompliance with an approved Wildfire Mitigation Plan or any law, regulation, or guideline within the authority of the Office."*

The NOV arises out of a March 25, 2025 inspection by Energy Safety in the vicinity of Hat Creek, CA, in High Fire Threat District (HFTD) Tier 2 of PG&E's Q4 QDR report for WMP Initiative 8.1.2.5.1 – Traditional Overhead Hardening (Transmission Conductor), Utility Initiative GH-06:

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 adhere to data accuracy on pole ID 013/251, Grid Hardening ID 74057080-6 at coordinates 40.816453, -121.366893.

Response

PG&E agrees with the identified finding that Hat Creek #1- Westwood structure 013/251 does not have a shunted splice between structure 013/250 and 013/251 and that the as-built record of evidence matches this field condition. When inputting the source data into the 2024 Fourth Quarter spatial Wildfire Mitigation Data Report (sWMDR) for GH-06, locations with the quantity of zero shunts were inadvertently included. This error resulted in location 013/251 being included in the sWMDR report. The 2024 sWMDR reports will be re-submitted by the next reporting period (November 1), as outlined in the OEIS' Data Guidelines Section 2.4 – Revisions to Previously Submitted Data.

Please do not hesitate to contact WSComplianceMailbox@pge.com if you have any questions regarding this matter.

Sincerely,

Daniel Kushner, PhD
Senior Director, Electric Risk & Compliance

cc: Samuel Isaiah, Senior Utilities Engineer Specialist, Energy Safety
Yana Loginova, Program Manager, Energy Safety
Shannon Greene, Program Manager, Energy Safety
Cecilia Yaniz, Field Inspector, Energy Safety