

October 2, 2025

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

RE: Energy Safety NOV ID: CAD\_PGE\_KSF\_20250408\_1326  
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. The NOV arises out of 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 was identified from an April 8, 2025 inspection by Energy Safety in the vicinity of the city of Los Gatos, CA, in High Fire Threat District (HFTD) Tier 2. This work was reported as part of PG&E's Q4 QDR report for WMP Initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses, Utility Initiative GH-10. The violation states as follows:

*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.*

## **Response**

PG&E concurs with Energy Safety's conclusion that pole ID GT 105595 does not include a Non-Exempt Expulsion Fuse as stated in our 2024 Fourth Quarter (Q4) spatial Quarterly Data Report (QDR). We determined that our records did not match the completed replacement of the Non-Exempt Expulsion Fuse with Solid Blade under operating number 33479. The pole ID GT 105595 shown in the Energy Safety provided photo, 'Item1GImg1', is not the structure where the work took place, but occurred at the relevant pole ID 33479, as shown in "Image 1" and "Image 2."



*Image 1: Correct structure (pole ID 33479) with completed replacement Non-Exempt Expulsion Fuse with Solid Blades.*



*Image 2: Zoomed in view of pole ID 33479 with completed replacement Non-Exempt Expulsion Fuse with Solid Blades.*

The work was performed under job number 31661650 with a completion date of November 2, 2024. Based on our construction records, there was a misalignment with the installation location update and the initially planned installation location. The Non-Exempt Fuse with Solid Blade installation that took place was correct, but the update to the construction records did not occur which led to our geo-spatial data misalignment. As shown in “*Image 3*”, the updated installation location is highlighted, and a mapping correction was initiated under Request for Work (RW) ID 131710678 in response, with a completion date of September 15, 2025.

| PG&E Pacific Gas and Electric Company                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |           | Circuit Map Change Sheet (CMCS) |             |                                           |                                         | TD-9450S-F01<br>Publication Date: 08/15/2016 Rev: 1 |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------|-------------|-------------------------------------------|-----------------------------------------|-----------------------------------------------------|--|
| ILIS Event No. _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |           | GIS Tag No. _____               |             | Control Center/AOR _____                  |                                         | DISTRIBUTION OPERATOR ENTRY                         |  |
| Substation and Circuit Number <u>LOS GATOS 1108</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |           | Prepared By <u>[REDACTED]</u>   |             | Engineering Approval By <u>[REDACTED]</u> |                                         | Map No. <u>11425</u>                                |  |
| Purpose of Work <u>REPL Non-Exempt Fuse w/ SB</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |           | Notif <u>126535697</u>          |             | Job Number <u>31661650</u>                |                                         | MAT <u>2AJ</u>                                      |  |
| Location <u><del>37.22830537, -121.9911843</del></u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |           | <u>37.227908, -121.991460</u>   |             | Town <u>Los Gatos</u>                     |                                         | Date <u>11/01/2023</u>                              |  |
| Construction Entry – New Installs or Removals                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |           |                                 |             |                                           |                                         |                                                     |  |
| Loc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Equip No. | Serial No.                      | Manufacture | Date Manuf.                               | Location                                | Town                                                |  |
| 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 33479     | <u>N/A</u>                      | <u>N/A</u>  | <u>N/A</u>                                | <u>37.22830537, -121.9911843</u>        | <u>Los Gatos</u>                                    |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |           |                                 |             |                                           | Pole SAP ID <u><del>100525797</del></u> | <u>100525794</u>                                    |  |
| <p>Show the north arrow, adjacent switch numbers, and the names of streets or roads, adjacent intersections, or land marks. Use a job sketch, if suitable. Sketches can be schematic but should approximate the geographic map.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <div style="border: 2px solid red; padding: 5px; margin-bottom: 10px;"> <p style="color: red; font-weight: bold;">Replace C/O 33479.<br/>Install Solid Blades and<br/>Fault Indicators at<br/>location.</p> </div> <p>Removed 2- p+44 cutouts<br/>2- 10T fuses</p> <p>installed 2- p+44 cutouts<br/>2- solid blades<br/>2- fault indicators</p> <div style="border: 2px solid red; padding: 5px; margin-top: 10px;"> <p style="color: red; font-weight: bold;">For adjacent/area<br/>devices, see next<br/>page schematic map</p> </div> </div> <div style="width: 65%; background-color: black; height: 200px;"></div> <div style="width: 30px; text-align: center;"> </div> </div> |           |                                 |             |                                           |                                         |                                                     |  |
| <p>The foreman must immediately report any completed work. For partially completed work, circle the portion that was completed. Include the date and show "completed."</p> <p>Work Completed By <u>[REDACTED]</u> Date <u>11-2-24</u> Recorded at control center by _____ Date _____</p> <p>Mapped By _____ Date _____ Forward this completed form to _____ Date _____</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |           |                                 |             |                                           |                                         |                                                     |  |

Image 3: Construction record with incorrect installation location in the red box and the correct and updated location in the green box.

We see this finding as an opportunity to address our internal record discrepancies through the following:

- We will create internal communications for construction crews to document (redline) all changes and updates made during construction in adherence to our existing As-Built process.

The Q4 2024 spatial QDR will be re-submitted by the next reporting period (November 1, 2025), as outlined in the OEIS' Data Guidelines Section 2.4 – Revisions to Previously Submitted Data which allow electrical corporations to make revisions once they become known.

Please do not hesitate to contact [WSComplianceMailbox@pge.com](mailto: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  
Keyshawn Ford, Field Inspector, Energy Safety