Pacific Gas and Electric Company®

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August 25, 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_1204
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 July 24, 2025, regarding the Office of Energy Infrastructure Safety's (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 a March 25, 2025 inspection by Energy Safety in the vicinity of the city 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 complete work on pole ID 011/229, Grid Hardening ID 74057080-3, at coordinates 40.828823, -121.381875. Energy Safety considers this completeness violation to be in the Minor risk category.*

Response

PG&E respectfully disagrees with Energy Safety's alleged NOV conclusion for Hat Creek #1-Westwood structure 011/229, which we understand to refer to the span of conductor between 011/229 and 011/230. We understand that upon observation, an assumption can be made that because two of the splices are closer to structure 011/230, they are a part of structure 011/230. As shown in "*Image 2*" below, in the engineering drawing 233949 revision 2, found within the as-built previously provided to Energy Safety, there are three splices between structure 011/229 and 011/230. Two of the three splices are shunted and positioned closer in proximity to 011/230. The other remaining splice is not shunted and is in closer proximity to 011/229. PG&E has confirmed this in the field, as is shown in "*Image 1*" below:

The splice depicted in the NOV letter 'Item1IA1Img2: Splice, is a moused splice and does not represent the splice that was designated for replacement under the 2024 grid hardening initiative.

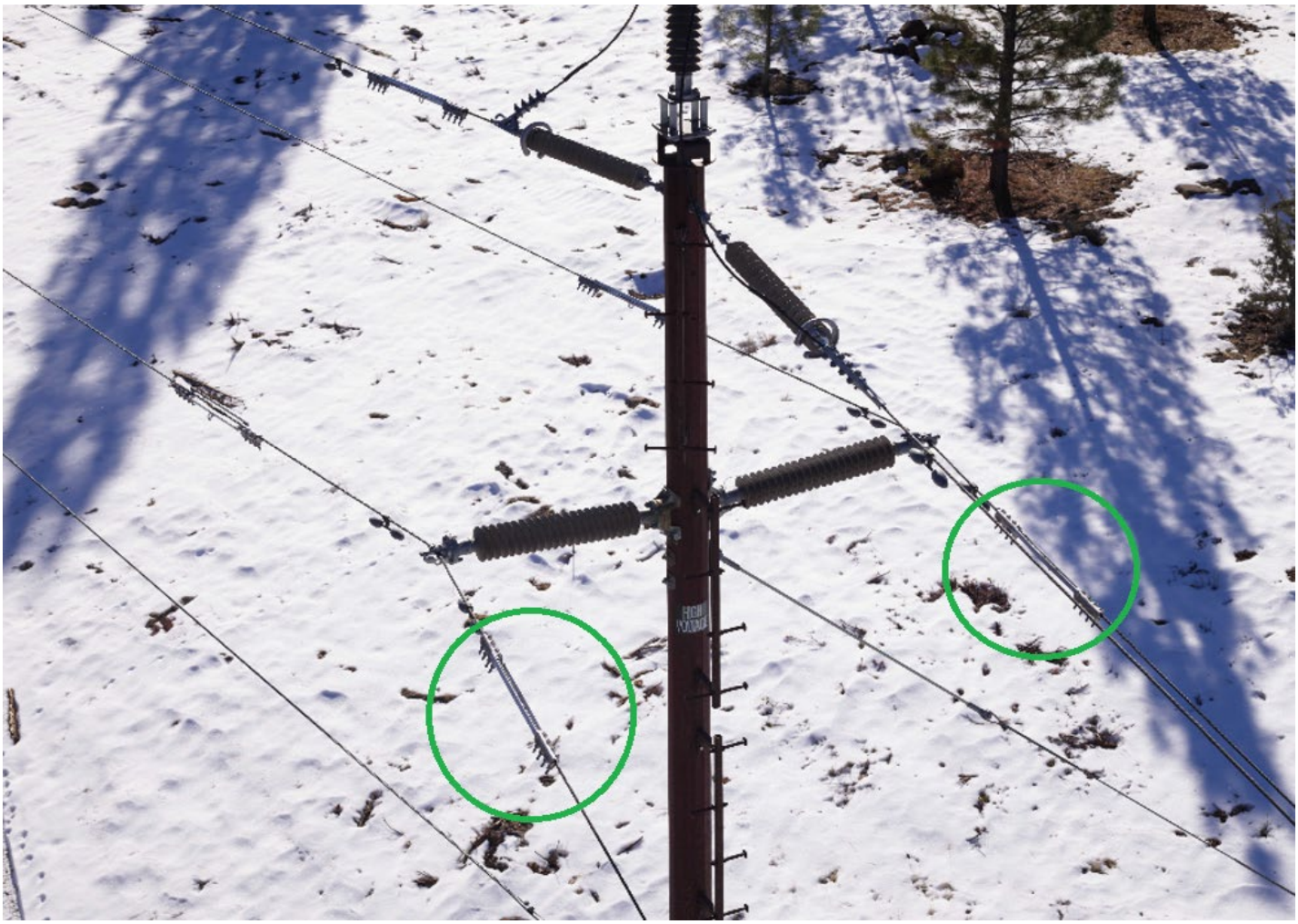

Image 1: Drone photos from December 2024 show the two shunt splices installed on the span of 11/229-11/230, but they are closer to structure 011/230 (as pictured).

STRUCTURE NO. FINAL	STRUCTURE NO. CONST.	STATION	LINE ANGLE	STRINGING HORIZ. SPAN-FT.	STRINGING RULING SPAN-FT.	STRINGING DRAWING	STRUCTURE TYPE	STRUCTURE X-ARM	STRUCTURE DRAWING	POLE DATA CLASS	POLE DATA LENGTH	POLE DATA SET DEPTH	GUY DATA AND ANCHOR SIZE (DWG 022178) LEFT V.D.	LEFT LEAD	LEFT SIZE	RIGHT V.D.	RIGHT LEAD	RIGHT SIZE	AHEAD V.D.	AHEAD LEAD	AHEAD SIZE	BACK V.D.	BACK LEAD	BACK SIZE	BOTTOM PHASE ELEVATION (FEET)	INSULATION DWG.NO. CKT. 1	INSULATION DWG.NO. CKT. 2	REMARKS FIGURES IN ( ) DENOTE HEIGHT ABOVE GROUND
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11/217																												
11/218																												
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11/229																												
11/230			14°	281'		015221 SHT. 2	TH		043620	1	55'	11.5	2010		41'	10M										D		(2) SHUNTS INSTALLED. 1 WESTERN UNION SPLICE WITHOUT SHUNT. Estimated for future ... Al & LDS pole installed

Image 2: Engineering drawing 233949 revision 2

In addition, for the 2026-2028 WMP, PG&E implemented a change to the GH-06 shunt splice program, in recognition of proactive improvements that could be made to the program. PG&E implemented the utilization of transmission LC notifications (priority P) to track and execute the completion of each shunt splice. By having individual notifications for each shunt splice, PG&E will have visibility and streamlined reporting. Please see attachment "*PGE_TD-3330P-26_20250825_CONF.pdf*", as this notification process already includes required location-specific photographs and documentation that undergoes the Work Verification process.

Please see attachment "*PGE_TD-8123P-104_20250825_CONF.pdf*", which states that the splice shunt work can utilize the notification process. Also see attachment "*PGE_TD-3330P-26_20250825_CONF.pdf*" Section 5, which discusses the quality control requirements of a notification. For additional context, please see Table 8-1 in the 2026-2028 WMP, which shows that GH-06 has moved from a target of number of lines, to a more unitized number of splice shunts.

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