



Daniel Kushner
Sr. Director
Electric Compliance

300 Lakeside Drive
Oakland, CA 94612
E-mail: Daniel.Kushner@pge.com

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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: NOV_CAD_PGE_RMA_20250409_1346
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.

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."

Energy Safety's April 9, 2025, inspection identified the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.5 - Non-Exempt Expulsion Fuses, on pole ID 121589579, Grid Hardening ID 31661602 at [REDACTED] Redwood City, CA, 94062, USA, [REDACTED] the inspector observed a non-exempt expulsion fuse, depicting an incomplete installation of a non-exempt fuse.

Response

PG&E respectfully disagrees with the Energy Safety data quality finding on April 9, 2025, Notice of Violation (NOV).

PG&E replaced: (1) three Part 44 cutout fuses with three Part 63 cutouts; and (2) three 20T fuses with three 20E type fuses. This work was performed on the proper pole: Fuse ID 88429, as shown in Image 1 at SAP Equipment # 100323195. This pole is one span away from the pole Energy Safety inspected.



Image 1: Fuse ID 88429 / SAP Equipment # 100323195

The non-exempt expulsion fuses were properly replaced with a CAL FIRE-exempt Type E Power Fuses. Thus, this location did receive an equipment change to a CAL FIRE-exempt configuration, contrary to the assertions in the NOV.

Please see attached “*PGE_NOV_1346_Atch01_20250825_CONF.pdf*” for the completed CMCS and work order. Images on pages 6 to 10 show fuses replaced with exempt figuration at the proper marked Fuse ID pole seen in Image 1 above. Also, as shown on page 5, the proper address was given that matches the correct Fuse ID Pole.

After investigation of the NOV, PG&E identified that the Fuse ID was mapped to the incorrect pole at SAP Equipment # 100299833. A map correction has already been made as can be seen below and placed to the correct pole at SAP Equipment # 100323195, which is where the fuses were replaced correctly. A revision to the Quarterly Data Report data in question will be provided prior to our planned November 01, 2025, submission.

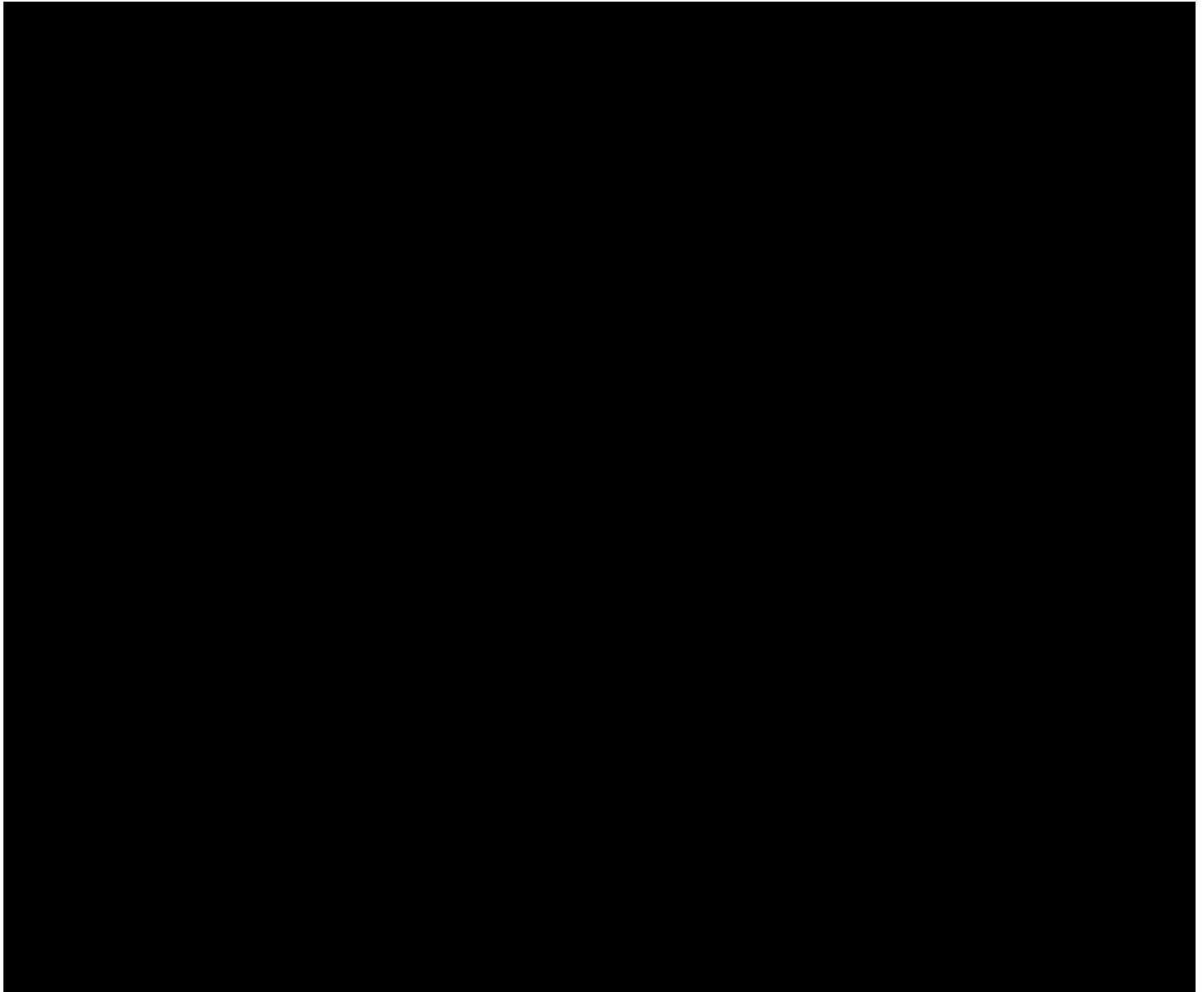


Image 2: Map Correction from SAP Equipment #100299833 to SAP Equipment #100323195

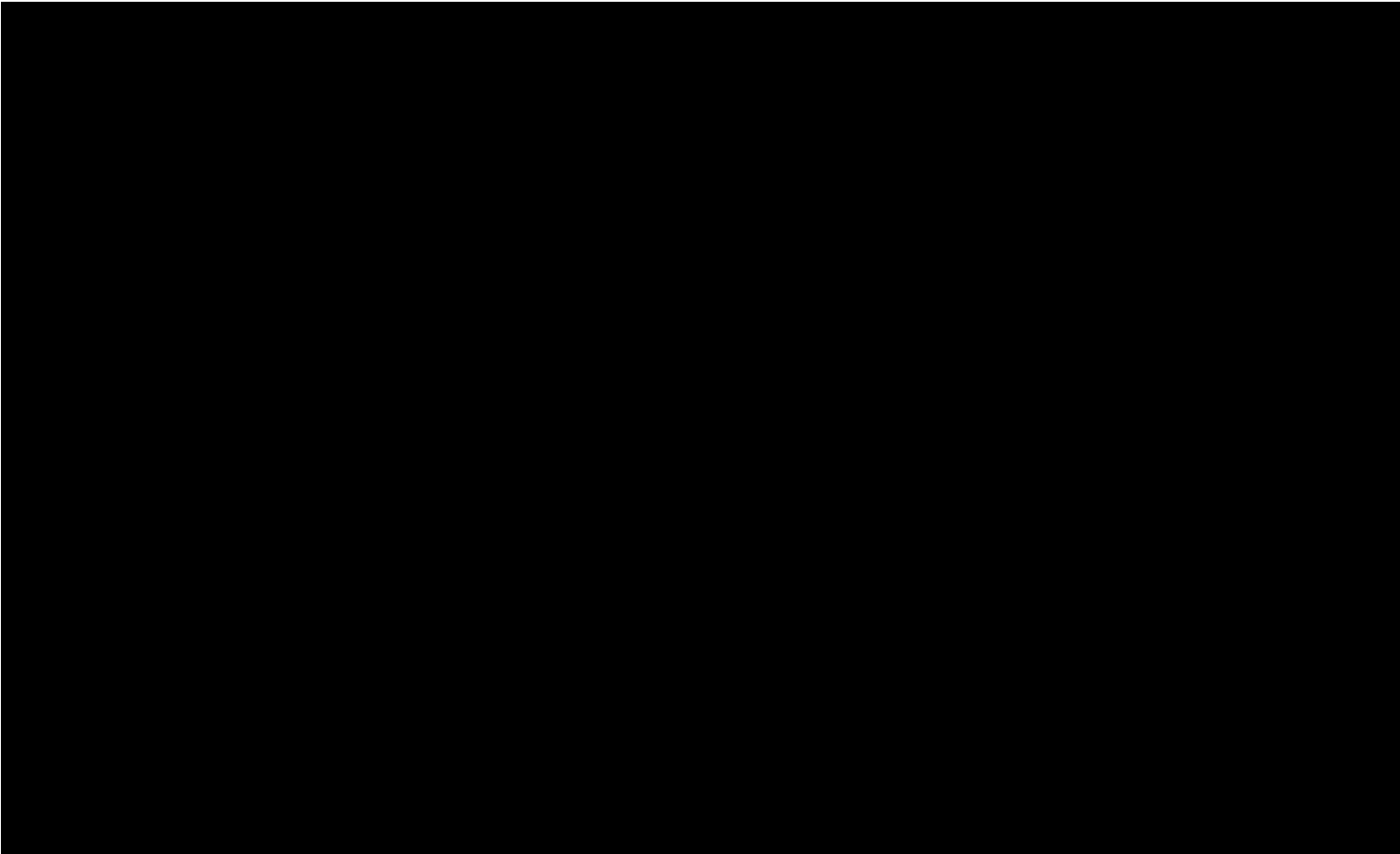


Image 3: Map Correction Completed and Operational in System with Fuse ID mapped to SAP Equipment 100323195.

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

Sincerely,

Daniel Kushner, PhD
Sr. Director, Electric Regulatory Compliance

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