

October 17, 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_RMA_20250327_0943
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 17, 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 was identified from a March 27, 2025 inspection by Energy Safety in the vicinity of the city of Grass Valley, CA, in High Fire Threat District (HFTD) Tier 3 of PG&E's Q4 QDR report for WMP Initiative 8.1.2.10.5 – Non-Exempt Expulsion Fuses, Utility Initiative GH-10:

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 121670245, Grid Hardening ID 31658456 at coordinates 39.187828, -120.925855.

Response

PG&E agrees that Energy Safety's finding of a missing protective red cap on the SMU20 fuse at pole ID 121670245 is a condition that requires corrective action. The non-exempt change was completed on October 15, 2024, under job number 31658456. We confirmed there to be a missing protective red cap on the SMU20 fuse at the date of installation.

This condition will be mitigated with the "E" priority EC notification number 131811258. This mitigation and prioritization are consistent with System Inspection program guidance in TD- 2305M-JA02.

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
Romeo Marroquin Ajcac, Field Inspector, Energy Safety