

APPENDIX A

Notice of Violation

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 14, 2025

CPUC-ID: E20220908-02

Vincent Tanguay, Senior Director
Electric Compliance, Electric Engineering
Pacific Gas and Electric Company
3000 Lakeside Drive
Oakland, CA 94612

Dear Mr. Tanguay:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) issues the following **Notice of Violation (NOV)** to Pacific Gas and Electric Company (PG&E) as part of its investigation of an incident that occurred on September 6, 2022, near the Oxbow Junction reservoir in California. This incident resulted in the Mosquito Fire, which burned approximately 76,788 acres, destroyed 78 structures, and damaged 13 others.

SED's investigation of the Mosquito Fire identified the following violations:

- six (6) violations of General Order (GO) 95, Rule 18;
- one (1) violation of GO 95, Rule 19;
- three (3) violations of GO 95, Rule 31.1;
- one (1) violation of GO 95, Rule 37 (as modified by Rule 54); and
- one (1) violation of Resolution 4184-E.

A summary of the relevant code sections and SED's findings is attached.

Please provide a response to the violations no later than August 13, 2025. Include PG&E's corrective action plan and all preventative measures taken by PG&E to remedy and prevent the recurrence of such violations. If you have any questions concerning this NOV, please contact Ed Pike at (626) 255-9827 or Ed.Pike@cpuc.ca.gov.

Sincerely,

Nathan Sarian
Program and Project Supervisor
Wildfire Safety and Enforcement Branch
Safety and Enforcement Division

Enclosure

CC: Lee Palmer, Director, Safety and Enforcement Division
Anthony Noll, Program Manager, Wildfire Safety and Enforcement Branch
Ed Pike, Senior Utilities Engineer, Wildfire Safety and Enforcement Branch

Mosquito Fire

Summary of Violations

General Order 95, Rule 18 – Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below

Level 2: Any other risk of at least moderate potential impact to safety or reliability: Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District.

1. Violations 1A, B, and C: Three Instances of GO 95, Rule 18 Violations for Missing Maintenance Deadlines

PG&E corrected three separate Level 2 safety issues at poles in a Tier 3 HFTD after the GO 95, Rule 18 deadline:

- PG&E repaired a woodpecker hole at Pole 014/186(A) under transmission notification 121584079 on August 1, 2022, instead of the December 23, 2021, deadline.
- PG&E repaired a loose tie wire at Pole 014/186(C) under transmission notification 121584077 on August 2, 2022, instead of the December 17, 2021, deadline.
- PG&E installed guy wire insulation at Pole 014/186(C) under transmission notification 117783297 on May 7, 2020, instead of the February 20, 2020, deadline.

GO 95, Rule 18.B.1.a.ii. requires that PG&E correct Level 2 safety issues located in Tier 3 HFTD within six months from the time of identification. PG&E provided no documentation of why repairs were not completed within the required time frame. PG&E violated GO 95, Rule 18 for failing to complete the repairs by the required maintenance deadline.

2. Violations 2A, B, and C: Three Instances of GO 95, Rule 18 Violations for Failing to Correct Loose Tie Wires

PG&E's Electric Transmission Preventive Maintenance Manual¹ and PG&E's May 10, 2022, "Five Minute Meeting Topic: Reminder during Inspections to Ensure Conductors are Properly Secured to Insulators via Tie Wires or Clamps"² require the correction of loose tie wires to prevent unsafe conditions. The Five Minute Meeting Topic document highlights past examples of pole fires in PG&E's

¹ TD 1001M, Rev. 5, August 31, 2020.

² "Five Minute Meeting Topic: Reminder during Inspections to Ensure Conductors are Properly Secured to Insulators via Tie Wires or Clamps" at 1 ("Recent events involving pole fires and unplanned outages have identified the need to clarify construction and inspection standards related to tie wires and conductor attachments to transmission poles. Failure to properly secure conductor to insulators on wooden transmission can lead to hot spots at the hardware due to leakage currents, resulting in ignition on the pole.")

system caused by loose or broken tie wires. PG&E staff documented the following loose tie wires, but PG&E failed to repair these loose tie wires:

- A PG&E inspector and SME documented a loose tie wire at Pole 000/003 in a May 25, 2022, transmission notification.
- A PG&E inspector and SME documented a loose tie wire at Pole 009/130 in a June 22, 2022, transmission notification.
- A PG&E inspector and SME documented a loose tie wire at Pole 014/186A in a June 9, 2022, transmission notification 123833466. This notification was cancelled because PG&E expected that work on the loose tie wire would be completed under transmission notification 121584077. However, transmission notification 121584077 only documents repairs to Pole 014/186C and not the tie wire repair at Pole 014/186A.

PG&E violated GO 95, Rule 18 for failing to correct these three loose tie wires.

General Order 95, Rule 19 – Cooperation with Commission Staff; Preservation of Evidence Related to Incidents Applicability of Rules states in part:

Each utility shall provide full cooperation to Commission staff in an investigation into any major accident (as defined in Rule 17) or any reportable incident (as defined in CPUC Resolution E-4184), regardless of pending litigation or other investigations, including those which may be related to a Commission staff investigation. Once the scene of the incident has been made safe and service has been restored, each utility shall provide Commission staff upon request immediate access to: Any factual or physical evidence under the utility or utility agent's physical control, custody, or possession related to the incident; The name and contact information of any known percipient witness; Any employee percipient witness under the utility's control; The name and contact information of any person or entity that has taken possession of any physical evidence removed from the site of the incident

3. Violation 3: GO 95, Rule 19 Violation for Failing to Preserve Evidence

On September 23, 2022, SED instructed PG&E to preserve as evidence Pole 09/131, the cross-arms and insulators and other attachments and all jumpers and conductors within 50 feet of the pole. PG&E disposed of Pole 009/131 and attached equipment on October 22, 2022,³ and did not notify SED until November 1, 2022. PG&E's failure to preserve evidence and provide full cooperation with SED's investigation violated GO 95, Rule 19.

General Order 95, Rule 31.1 – Design, Construction and Maintenance states in part:

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

³ See DRU11846_PGE-CPUC_06162023_SED_002_Mosquito Fire_Q050.pdf provided on June 16, 2023, in response to Data Request SED-PG&E-002, Question 50.

4. Violation 4: GO 95, Rule 31.1 Violation for Failing to Complete Switch Maintenance at Oxbow Junction Pole

In the absence of another specific, applicable CPUC rule, GO 95, Rule 31.1 requires that a utility follow its internal procedures because by adopting them, the utility has established that those procedures are accepted good practices. PG&E did not complete function testing required by PG&E's "Switch Maintenance and Inspection Program for Electric Transmission," (Utility Procedure TD 1006P 02) at Switches 47 and 49. Utility Procedure TD 1006P 02 includes function testing requirements and represents a "best practice" for these switches. PG&E's history of operational problems involving Switch 47 emphasizes the importance of completing all maintenance and inspection requirements.⁴ Thus, PG&E violated GO 95, Rule 31.1 for failing to complete function testing for Switches 47 and 49.

5. Violation 5: GO 95, Rule 31.1 Violation for Failing to Clear Vegetation Around the Oxbow Junction Pole

PG&E's "Operations and Maintenance Plan Electric Facilities on National Forest System Lands within the Pacific Southwest Region"⁵ requires that PG&E clear vegetation within a 10-foot radius of the Oxbow Junction Pole, up to a height of 8 feet from the ground. The vegetation clearance section of PG&E's O&M plan represents a "best practice" under GO 95, Rule 31.1. PG&E's failure to comply with this plan, which left flammable vegetation near the Oxbow Junction Pole during the 2022 fire season, violated GO 95, Rule 31.1.

6. Violation 6: GO 95, Rule 31.1 Violation Because PG&E's CIRT Failed to Adequately Justify Cancelled Repair Work

CIRT cancelled six repairs for PG&E equipment near the Oxbow Junction Pole without providing adequate justification as required by PG&E's internal policies. CIRT's failure to justify cancellation of the recommended repair work listed below violated Rule 31.1.

Table of six cancelled notifications found near Oxbow Junction pole

Pole 014/187 - Four wedge connectors (notification dated May 27, 2022)
Pole 000/003 - Chipped insulator (notification dated June 25, 2021)
Pole 009/131 - Cotter pin and key (notification dated May 26, 2022)
Pole 000/003 - Vegetation obscuring section of guys and anchors (notification dated May 25, 2022)
Pole 000/003 and Pole 009/130 - Loose tie wires (notifications dated May 25, 2022, and June 22, 2022, respectively)

General Order 95, Rule 37 – Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, etc. states in part:

...clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.

⁴ For example, on April 25, 2022, PG&E found the lower phase of Switch 47 burned. Subsequently, on April 30, 2022, four attempts to open and close Switch 47 via SCADA failed. Later, PG&E staff suspected arcing at Switch 47 on August 26, 2022. However, PG&E staff did not find evidence of arcing in the field.

⁵ Issued December 2018 and updated August 2020.

General Order 95, Rule 54 – Conductors states in part:

... modifications of the basic clearances in Table 1 (see Rule 37) are contained in Rule 37 and sections of 54.4 (D), including 54.4 (D)(6) Deadended on Pole sub-section (b) which states in part, “Where conductors are supported on a climbable pole in vertical configuration, the energized portions of such conductors shall have clearances of not less than 15 inches from the surface of the pole for voltages between 750 and 7,500 volts and 18 inches from the surface of pole for voltages in excess of 7,500 volts.”

7. Violation 7: GO 95, Rule 37 as Modified by Rule 54 Violation – Lack of Clearance between Lower Phase Jumper and Pole

PG&E failed to maintain the required clearance between the Oxbow Junction Pole and the jumper cable connecting the lower phases of Switches 47 and 49 on September 6, 2022, and created an electrical fault path. PG&E violated GO 95, Rule 37 clearance requirements as modified by Rule 54.

Resolution 4184-E – Adoption of Web-Based Emergency Reporting System for Utilities and Generation Asset Owners states in part:

Within 2 hours of a reportable incident during normal working hours or within 4 hours of a reportable incident outside of normal working hours, the utility shall provide notice to designated CPUC staff of the general nature of the incident, its cause and estimated damage.

8. Violation 8: Resolution 4184-E Violation for Late Initial Notification

PG&E was required to file an initial notification regarding the Mosquito Fire by September 7, 2022, because PG&E staff were aware that the Oxbow Junction Pole ignited or potentially ignited the Mosquito Fire soon after the fire started at about 1800 hours on September 6, 2022. In addition, PG&E staff were present at the location at about 2000 hours on that date. PG&E did not provide this initial notification until September 8, 2022, in violation of Resolution 4184-E.