

APPENDIX B

PG&E Response to Notice of Violation



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Reference: CPUC-ID: E20220908-02

Notice of Violation: General Order (GO) 95, Rule 18, Rule 19, Rule 31.1, Rule 37; and Resolution 4184-E

Dear Mr. Sarina:

This letter is in response to the above referenced Notice of Violation (NOV) dated July 14, 2025, regarding the investigation of the Safety and Enforcement Division (SED) into the Mosquito Fire, which ignited on September 6, 2022, near the Oxbow Junction Reservoir in Placer County, California (the Incident Location).

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

The SED investigation identified the following violations:

General Order 95, Rule 18 – Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, which 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.”

General Order 95, Rule 19 – Cooperation with Commission Staff; Preservation of Evidence Related to Incidents Applicability of Rules, which 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.”

General Order 95, Rule 31.1 – Design, Construction and Maintenance, which 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.”

General Order 95, Rule 37 – Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, etc., which 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.”

General Order 95, Rule 54 – Conductors, which 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.’”

Resolution E-4184 – Adoption of Web-Based Emergency Reporting System for Utilities and Generation Asset Owners, which 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.”

SED alleges three instances of work orders not being completed by the required maintenance deadline in violation of GO 95, Rule 18. SED also alleges three instances of failing to correct loose tie wires in

violation of GO 95, Rule 18. SED alleges that PG&E failed to preserve evidence and did not provide full cooperation with SED's investigation in violation of GO 95, Rule 19. SED alleges that we violated GO 95, Rule 31.1 by (1) failing to complete function testing for Switches 47 and 49; (2) failing to comply with the Operations and Maintenance Plan Electric Facilities on National Forest System Lands within the Pacific Southwest Region, which requires PG&E to clear vegetation within a 10-foot radius of a non-exempt pole, up to a height of 8 feet from the ground; and (3) cancelling six repairs for PG&E equipment near the Incident Location without providing adequate justification as required by PG&E's internal policies. SED also alleges we failed to maintain the required clearance between the pole at the Incident Location and the jumper cable connecting the lower phases of the switches on the pole, creating an electrical fault on September 6, 2022, in violation of GO 95, Rule 37 as modified by Rule 54. Finally, SED alleges we provided a late initial notification of the Mosquito Fire in violation of the requirements in Resolution E-4184.

We address each of SED's identified violations in detail below. We also describe corrective actions and operational improvements we have made since the Mosquito Fire that we believe will prevent recurrence of issues alleged in the NOV.

Background

On September 6, 2022, Northern California experienced an extreme and record-setting heat event.

At 1533 hours, Northern California Power Authority (NCPA) notified PG&E that Oxbow Powerhouse (Oxbow PH), a hydroelectric facility located in Placer County, California, had gone offline about 25 minutes earlier. Placer County Water Authority (PCWA) owns Oxbow PH. NCPA operates PCWA's electrical equipment on PCWA's behalf. NCPA requested permission to try to re-parallel Oxbow PH but expressed concern about low voltage conditions on the Middle Fork #1-60kV and Weimar #1-60kV transmission lines. During this conversation, the PG&E Grid Control Center (GCC) informed NCPA that if the Oxbow PH could support paralleling at the voltage conditions, NCPA had permission to attempt to parallel Oxbow PH.

At 1541 hours, NCPA reported to PG&E GCC that it was not able to parallel the Oxbow PH. By 1600 hours, GCC staff were concerned about low voltage in the Foresthill area. To raise the voltage at Foresthill Substation and Oxbow Junction, the GCC developed a plan to transfer the Foresthill Substation load from the Weimar #1-60kV line source to the Middle Fork #1-60kV source. To execute this plan, the normally open Switch 47 at PG&E Pole 014/191 at Oxbow Junction (the Oxbow Junction Pole) would need to be closed. The GCC plan was to operate and close Switch 47 via SCADA after both the Weimar #1-60kV and Middle Fork #1-60kV lines were de-energized (i.e., on a dead line) given the R4 critical conditions for fire danger.

At 1807 hours, an NCPA Operator remotely opened the Middle Fork CB 32 as instructed by the PG&E GCC Operator. This operation de-energized the Middle Fork #1-60kV line up to the open Oxbow Junction Switch 47. At 1810 hours, the PG&E GCC Operator remotely opened the Weimar CB 52. This operation de-energized the Weimar #1-60kV line up to Oxbow Junction and de-energized the Foresthill Substation. At 1812 hours, the PG&E GCC Operator remotely closed Oxbow Junction Switch 47 when both Middle Fork #1-60 kV and Weimar #1-60 kV lines were de-energized. This operation connected the Middle Fork #1-60kV and the Weimar #1-60kV lines at Oxbow Junction. At 1815 hours,

as directed by PG&E GCC, an NCPA Operator remotely closed the Middle Fork CB 32. This operation briefly energized the Weimar #1-60kV and Middle Fork #1-60kV lines and the Foresthill Substation. The NCPA Operator, however, reported to the PG&E GCC Operator that the moment the Middle Fork CB 32 was closed, the Middle Fork CB 32 relayed and opened. The NCPA Operator requested permission from the PG&E GCC Operator to try and remotely close the Middle Fork CB 32 again. The PG&E GCC Operator did not give the NCPA Operator permission to try this operation again, but our Energy Management System indicates a second operation of CB 32. These switching operations impacted a total of 2,699 customers.

At 1817 hours, NCPA called PG&E GCC to report a fire near Switch 47 at Oxbow Junction.

At 1820 hours, the PG&E GCC contacted a PG&E transmission troubleman and dispatched him to Oxbow Junction. The troubleman contacted the local PG&E Public Safety Specialist (PSS) and they met on Mosquito Ridge Road at 1930 hours. At 2000 hours, the troubleman and PSS met up with a CAL FIRE Battalion Chief “Incident Commander” at the Incident Command post. The troubleman and the PSS received approval from the Incident Commander to drive down to Oxbow Junction. While traveling to Oxbow Junction, they were met by a PCWA Manager who informed them that the fire started around Oxbow Junction. The troubleman and the PSS continued to Oxbow Junction. Upon arrival, the troubleman reported to the GCC that Switch 47 appeared to be closed. They also traveled to the nearby Oxbow PH.

According to the United States Forest Service (USFS) website, the Mosquito Fire began on September 6, 2022, at 1827 hours in the area of Mosquito Ridge Road and Oxbow Reservoir east of Foresthill in Placer County. All customers were restored on September 7, 2022, by 1150 hours.

We closely monitored the fire and, out of an abundance of caution, reported this incident to the Commission on September 8, 2022, under the property damage criteria.

Between the start of the fire on September 6, 2022 and September 22, 2022, the USFS restricted access to PG&E equipment near the Incident Location. During a site visit on September 22, 2022, PG&E personnel viewed the Oxbow Junction Pole from the ground and a bucket truck next to the Oxbow Junction Pole. The PG&E personnel observed a jumper on the lowest phase of Switch 47 at the Oxbow Junction Pole did not appear to have the proper clearance from the interconnection switch rod.

Our Response

Violations 1A, B, and C – GO 95, Rule 18

As an initial matter, we note that the three line corrective (LC) tags identified in Violation 1 are not associated with the Oxbow Junction Pole and were completed before the fire.

We agree with this violation and address below each of the Level 2 tags of moderate potential impact to safety or reliability that were not repaired pursuant to the timelines set forth in GO 95, Rule 18.

- A. We agree that corrective work for a woodpecker hole in Pole 014/186(A) was not remedied within six months.¹ We created LC tag #121584079 on June 23, 2021 to repair woodpecker damage identified during a June 17, 2021 inspection, determined it was a priority E notification, and assigned a required end date (RED) of December 17, 2021. We performed a Field Safety Reassessment (FSR) of the tag on November 8, 2021 to determine if the potential risk from the woodpecker damage had worsened in condition and needed to be escalated to a higher priority tag. We determined that the condition had not changed or worsened. The repair was completed on August 1, 2022.
- B. We agree that a loose tie wire at Pole 014/186(C) was not remedied within six months.² We created LC tag #121584077 on June 23, 2021 after a June 17, 2021 inspection identified the loose tie wire. We determined it was a priority E notification and assigned an RED of December 17, 2021. We performed an FSR on November 8, 2021 to determine if the potential risk from the loose tie wire had worsened in condition and needed to be escalated to a higher priority tag. We determined that the condition had not changed or worsened. An additional FSR on June 15, 2022, led us to upgrade the notification to priority B. The repair was completed on August 1, 2022.
- C. We agree that guy wire insulation at Pole 014/186(C) was not remedied by the RED.³ We created LC tag #117783297 on August 21, 2019 to install missing guy wire insulators identified during an August 20, 2019 inspection. We determined it was a priority B notification and assigned an RED of November 18, 2019. We have not been able to ascertain why this repair was not completed by November 18, 2019. The repair was completed on May 7, 2020.

Recognizing the issues with timely completing tags, PG&E has made significant improvements to our transmission maintenance repair work since September 2022. Please see the discussion below regarding our current approach to addressing outstanding transmission maintenance tags.

Transmission Maintenance Tags

Transmission maintenance tags that are past due or nearing their completion deadline are addressed through our transmission maintenance tag program explained in detail in our 2026-28 Wildfire Mitigation Plan (WMP).⁴ The goal of this program is to manage risk associated with open tags while we work to efficiently reduce the number of open transmission maintenance tags using a risk prioritization approach.

As the WMP discusses, prioritization of open work orders (notifications) uses the priority levels A, E, and F that are defined in PG&E's procedure "Electric Transmission Line Guidance for Setting Priority Codes," TD-8123P-103 and correspond to GO 95 Levels 1, 2, and 3, respectively. The B-priority for

¹ Violation 1A in the NOV.

² Violation 1B in the NOV.

³ Violation 1C in the NOV.

⁴ See PG&E 2026-2028 WMP (R0), Section 8.6.1, pp. 311-14: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/pge-2026-2028-base-wmp-vol1-r0.pdf>.

transmission notifications has been phased out as of the start of 2023 so that the internal priority levels have a one-to-one correspondence with the GO 95 Levels. Priority E notifications now can be created with deadlines shorter than the allowable GO 95 timeframes and those with three-month deadlines are addressed in the same manner as the former priority B. A significant increase in the number of notifications created since 2019 following the expansion of enhanced inspections, with new inspection technologies, under our Wildfire Safety Inspection Program led to a backlog of E and F notifications requiring additional prioritization.

The High Fire Threat District (HFTD)/High Fire Risk Area (HFRA) ignition-related backlog of notifications created before 2023 was closed in 2024. HFTD or HFRA non-ignition-related notifications opened before 2023 will be repaired opportunistically through 2027, bundling the work with ignition-related notifications on the same structure or circuit when practical to enable an efficient approach for our customers. New HFTD and HFRA notifications created in 2023 and later are targeted for repair by their required deadlines, barring external factors.⁵ There will continue to be a backlog of ignition and non-ignition related transmission notifications in non-HFTD areas that are assessed through the FSR Program to monitor conditions for escalation if required. These non-HFTD transmission notifications are being addressed on a risk-informed basis including, for instance, wildfire risk and public safety.

Open notifications may be reassessed during a subsequent inspection of an asset. An FSR is scheduled for late notifications if the condition is capable of further degrading over time, and under some conditions this requirement may be satisfied by a reassessment occurring during an inspection. Notifications receive additional FSRs if they remain open, at an interval depending on the HFTD per TD-8123P-101.

Violations 2A, B, and C – GO 95, Rule 18

We respectfully disagree with this violation. We also note that the LC tags identified in Violation 2 are not associated with the Oxbow Junction Pole or the Mosquito Fire ignition.

We address below each assertion in SED Violation 2 that we failed to repair a loose tie wire and explain why there was no violation of GO 95, Rule 18.

- A. We respectfully disagree that we failed to repair a loose tie wire at Pole 000/003.⁶ Centralized Inspection Review Team (CIRT) reviewed the May 25, 2022 inspection summary and determined the tie wire was tight and wrapped well around the biscuit (the circular area at the top of the insulator), meaning the insulator and conductor were held tightly in place. CIRT also observed that the insulator was lying flat on the conductor, indicating the tie wire was tight and firmly securing the insulator to the conductor. CIRT did not observe any indication of a loose tie wire in the photos in the inspection report, such as a sagging or askew jumper or a broken or

⁵ External Factors are reasonable circumstances that may impact execution against targets, including, but not limited to, physical conditions, environmental delays, landowner or customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, wildfires, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations.

⁶ Violation 2A in the NOV.

damaged tie wire. Thus, we determined and maintain there was no loose tie wire at Pole 000/003 that needed to be repaired and there was no violation of GO 95, Rule 18.

- B. We respectfully disagree that we failed to repair a loose tie wire at Pole 009/130.⁷ CIRT reviewed the June 22, 2022 inspection summary and determined the tie wires were not loose; they were snug around the biscuit. Thus, we determined and maintain there was no loose tie wire at Pole 009/130 that needed to be repaired and there was no violation of GO 95, Rule 18.
- C. We respectfully disagree that we failed to repair a loose tie wire at Pole 014/186(A), the left child pole of a three-pole child structure.⁸ CIRT cancelled LC tag #123833466 documenting a tie wire not to standard at Pole 014/186(A) because the work was to be completed under an existing LC tag, LC tag #121584077. Although LC tag #121584077 was assigned to Pole 014/186(C), the right child pole, there also was a second existing tag, LC tag #121584079, assigned to Pole 014/186(A), the left child pole. The work on the two LC tags was performed together, and the construction completion checklist for each tag shows a check mark in the box: “Tie wires installed properly when required.” Further, the work completion images associated with the tags include close-up photos of the top of both the right and left child poles, identifying the parts of the facilities on which the contractor performed his repairs. Accordingly, we believe the tie wire identified as “not to standard” in LC tag #123833466 was corrected on August 1, 2022.

Violation 3 – GO 95, Rule 19

As an initial matter, we note that Pole 009/131 and attached equipment, which were located two spans to the east of the Oxbow Junction Pole, were not involved in the ignition of the Mosquito Fire.

We acknowledge that on September 23, 2022, SED staff asked PG&E to provide notice before pole 009/131 and its attached equipment were removed during post-fire restoration efforts and to preserve the same following their removal. However, we removed pole 009/131 and attached equipment by helicopter and deposited the removed items in dumpsters on October 22, 2022 and did not notify SED of this action until November 1, 2022. The removal of pole 009/131 and attached equipment, and the depositing of the equipment in the dumpsters, without prior notification was an error on PG&E’s part and due to an internal miscoordination during our post-fire restoration work.

We respectfully disagree that a failure to notify SED before removing pole 009/131 and its attached equipment, and depositing the removed items in dumpsters, constitutes a violation of GO 95, Rule 19. We have endeavored to fully cooperate with SED during the investigation of the Mosquito Fire. We have responded to hundreds of data requests that include multiple subparts. We have participated in site visits, conducted numerous interviews on various topics with SED Staff, and responded to follow up questions. Consistent with Rule 19, we have provided access to evidence under our control. After learning that Pole 009/131 had been removed and deposited in dumpsters, we provided a video to SED Staff of the pole’s removal that a PG&E crew had taken in connection with restoration activities. In

⁷ Violation 2B in the NOV.

⁸ Violation 2C in the NOV.

addition, PG&E retained the dumpsters over the winter and offered to arrange a site inspection to view the contents of the dumpsters, but SED declined. PG&E then took photographs of the contents in each of the dumpsters and the outside of the dumpsters and provided the photographs to SED.

We are working to improve our internal and external communications to prevent miscoordination when performing post-fire restoration work for our customers. We recently hired several former CAL FIRE investigators who work with our investigation and field crew teams in response to ignitions in our service territory. This has helped us improve our communication with the agencies that have jurisdiction over fire investigations. The work of the former CAL FIRE investigators, in conjunction with the work of our local Public Safety Specialists, has also helped improve our internal communications in the aftermath of a fire between our ignition investigation, field crews, Law, and Regulatory groups, as well as our communication with interested regulators, like SED.

Violation 4 – GO 95, Rule 31.1

We respectfully disagree with this violation. While we agree that beginning on March 31, 2015, PG&E's written standards required function testing every six years and function testing was not completed for Switch 47 and Switch 49 between March 31, 2015 and September 5, 2022, these switches were operated several times a year during that timeframe. The purpose of a function test is to ensure the switch is operating properly. If PG&E personnel observe the proper operation or utilization of a switch, this accomplishes the general purpose of the function test. Switch 47 was opened and closed during testing following repairs of Switch 47 on April 25, 2022 and following replacement of the motor operator for Switch 47 on May 7, 2022. PG&E transmission troublemen also observed Switch 47 operating properly on August 26, 2022 and again on August 28, 2022, approximately 10 days before the ignition of the Mosquito Fire. Switch 49 was opened and closed on February 21, 2022. Given these proper operations in the weeks and months immediately preceding the ignition of the Mosquito Fire, we do not have reason to believe that function tests would have provided additional information.

PG&E maintains that a failure to follow our written standard in this instance is not sufficient to establish a violation of GO 95, Rule 31.1. And we believe our testing and operation of Switch 47 and Switch 49 was consistent with industry standards.

Since the Mosquito Fire, we have developed a high-risk designation for switches that takes into account criteria such as, but not limited to, the location of a switch in a HFTD or HFRA, manufacturing defects, age of the switch, and switch type. We have a plan to function test all high-risk switches by the end of 2028 on a risk-informed basis. We have also significantly increased our function testing since 2022. In 2023, we completed 164 function tests of high-risk switches, and in 2024, we completed 438 function tests of high-risk switches. We have implemented process improvement for scheduling function tests of high-risk switches by integrating them into our core maintenance tracking tools, and we are on track to complete function testing of 268 high-risk switches by the end of 2025. We will complete function testing of all remaining high-risk switches by 2028. Thereafter, all high-risk switches will undergo function testing on an eight-year cycle.⁹ High-risk switches are also subject to aerial inspection every three years via routine, detailed drone-based inspections, and infrared inspections.

⁹ TD-1006P-02, Rev. 3 (Oct. 20, 2024).

Violation 5 – GO 95, Rule 31.1

We respectfully disagree with this violation. Although we agree that our Operations and Maintenance Plan (which incorporates the requirements of Cal. Pub. Res. Code § 4292 by reference) required that we clear vegetation within a 10-foot radius of the Oxbow Junction Pole, up to a height of 8 feet from the ground, we respectfully disagree that flammable vegetation was present within this space during the 2022 fire season.

PG&E acknowledges that our contractor did not complete a work order for pole clearance work at the Oxbow Junction Pole in May 2022. However, our review of photos taken on or about August 9, 2022, in which the 10-foot clearance cylinder is visible, indicates that although there was intermittent vegetation growth on the rocks within the 10-foot cylinder at that time, it was de minimis and disconnected from the vegetation upslope by the rock outcrop, which constituted a natural barrier to prevent the spread of fire. We therefore were in compliance with the Plan's requirements and respectfully disagree that we violated GO 95, Rule 31.1.

We have taken multiple steps to improve our pole clearing processes since September 2022. First, on October 1, 2023, we began using a new enterprise system, One VM, to manage our various vegetation management program requirements and support our work processes. One VM consolidates information that was previously stored in separate systems, which has helped both to streamline data input and to increase visibility into the real-time status of pole clearing operations across our service territory.¹⁰ One VM also integrates with reporting tools and/or software (such as Microsoft PowerBI), which help us to identify areas of improvement.

Second, as we discuss in our 2026-2028 WMP, prior to 2025, our initial pole clearing work started in sync with the pole clearing inspection in the prior year.¹¹ To improve and maintain compliance, we changed the pole clearing program in 2025 to include a second maintenance cycle from September through December, barring external factors. This change shortens the clearing gaps between initial clearing and maintenance cycles and reduces the amount of regrowth between clearing cycles.

Third, we are working to ensure better communication and collaboration between our Vegetation Management and Electric Operations teams. For example, PG&E contractor personnel are instructed to reach out to Vegetation Program Managers (VPMs) to identify alternative methods for clearing difficult-to-clear poles.¹²

Fourth, within the Vegetation Management team, we have increased our headcount of VPMs. We also have expanded our reliance on Daily Operating Review (DOR) meetings, which are held every morning

¹⁰ PG&E 2023-2025 WMP (R8), Section 8.2.4, pp. 699-700, provides additional information: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/021325-2023-2025-wmp-r8.pdf>.

¹¹ See PG&E 2026-2028 WMP (R0), Section 9.4.4, p. 379: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/pge-2026-2028-base-wmp-vol1-r0.pdf>.

¹² TD-7112P-01, Rev. 2, Section 9 (May 26, 2025).

with our staff and the operations leadership of vendors, and on Weekly Operating Review (WOR) meetings, which are held weekly and include our staff as well as vendor field staff. These meetings are intended to discuss daily and weekly priorities and challenges.

Fifth, we have enhanced our quality management program and bolstered other strategic initiatives intended to ensure we meet targets for pole clearing and vegetation management. As we discussed in the 2023-2025 WMP, we increased our quality control (QC) target pass rate for pole clearing in HFTDs year over year, from 80% in 2023, to 88% in 2024, to 95% in 2025.¹³ As we reported in our 2023 and 2024 Annual Compliance Reports for our WMPs, we surpassed these target pass rates in both years, achieving an 86.1% QC pass rate in 2023 and an 88.3% QC pass rate in 2024.¹⁴ Through week 30, our 2025 pole clearing QC pass rate is over 99%. Going forward, we are also working to integrate our quality management program into the One VM system to provide additional real-time information to vegetation management personnel. Vendors are required to perform self-audits and to report the results of these self-audits.

Finally, in recent years, we have deployed additional resources to prioritize pole clearing in light of exigent circumstances. In 2025, for example, we have undertaken a Transmission Structure Risk Reduction (TSRR) project to clear certain transmission structures beyond the requirements of Pub. Res. Code § 4292. In other circumstances, out of an abundance of caution, we have evaluated and implemented pole clearing even where exempt equipment is present.

Violation 6 – GO 95, Rule 31.1

We respectfully disagree with this violation. We also note that the six transmission notifications identified in SED Violation 6 do not relate to the Oxbow Junction Pole or the Mosquito Fire ignition.

Our procedure requires that CIRT members “DOCUMENT the basis for the cancellation [of a notification] in the long text of the notification by citing the appropriate standard or a technical basis explaining why the condition is normal and is not a degradation of any required design function.”¹⁵

CIRT members adhered to this procedure for each of the six transmission notifications identified in Violation 6. For each transmission notification identified in Violation 6, CIRT members documented the basis for the cancellation in the long text of the notification by citing the appropriate standard or a

¹³ See PG&E 2023-2025 WMP (R8), Table 8-18-2 (Revised), p. 709:

<https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/021325-2023-2025-wmp-r8.pdf>.

¹⁴ See PG&E’s Annual Report on Compliance R1 for 2023 Wildfire Mitigation Plan, p. 28 (Apr. 25, 2024): <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/04-02-2024-pge-2023-arc.pdf>; PG&E’s Annual Report on Compliance R1 for 2024 Wildfire Mitigation Plan, p. 25: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/2024-annual-report-on-compliance-for-wildfire-mitigation.pdf>.

¹⁵ TD-1001P-10, Rev. 1, Section 4.8 (Apr. 2, 2023).

technical basis explaining why the condition is normal and is not a degradation of any required design function.

Violation 6 does not explain on what basis SED determined that CIRT members did not provide “adequate justification as required by PG&E’s internal policies.” PG&E’s policies and procedures do not use the phrase “adequate justification.” That phrase also is not used in GO 95, Rule 31.1 or any other applicable statute or regulation of which we are aware.

Our policies and procedures do not require that CIRT members provide an exhaustive list of all reasons for cancellation (indeed, doing so would be an unnecessary administrative burden). CIRT uses the “Invalid” reason code to cancel notifications with conditions that CIRT determines do not require correction. CIRT members cancel notifications using the “Invalid” reason code only after careful review and consideration based on their expertise and technical judgment to ensure that the potential issue flagged in the notification is in fact in conformance with our standards and is in safe and operable condition. Violation 6 does not assert and we do not believe the cited cancellations created a safety hazard, lacked a technical basis, or were otherwise incorrect. Our responses to SED’s data requests discuss in detail the basis for each cancellation:

Transmission Notification Cancelled	PG&E Responses to SED Data Requests
Pole 014/187 – four wedge connectors	SED-003, Question 13; SED-004, Question 34; SED-006, Question 6
Pole 000/003 – chipped insulator	SED-004, Question 29
Pole 009/131 – cotter pin and key	SED-003, Question 15
Pole 000/003 – vegetation obscuring section of guys and anchors	SED-004, Question 31
Pole 000/003 – loose tie wire	SED-003, Question 16
Pole 009/130 – loose tie wire	SED-004, Question 20; SED-004, Question 21; SED-005, Question 13, SED-006, Question 17

We complied with our internal policies and procedures for cancelling the transmission notifications identified in Violation 6. And there is no basis to find a violation of GO 95, Rule 31.1.

We also note that post Mosquito Fire, CIRT has established internal quality management and control practices that include reviewing how CIRT members document cancellations of notifications. Specifically, following CIRT review, all transmission notifications are subject to an automated review to determine that certain fields, including the long text, are complete and consistent with the priority assigned. A CIRT member reviews and corrects notifications that the automated review flags as incomplete or not consistent with the priority assigned. CIRT also has established a quality control review team that audits samples of transmission notifications approved for repair, transmission notifications CIRT cancels, and field-safety reassessments. A CIRT member manually re-reviews each

audited notification. The reviewer analyzes the notification, the underlying documentation identifying the potential issue, and the CIRT pod's decision. The reviewer confirms the accuracy of the decision to repair or cancel a notification, the priority assigned to a repair, and the sufficiency of the documentation justifying the repair or cancellation. These quality management and control practices are set forth in our internal TCIRT Quality Manual for CIRT members, which we provided to SED. While these practices were not yet implemented at the time of cancellation of these notifications, all newly created notifications that CIRT reviews today are subject to the reviews described above.

Violation 7 – GO 95, Rule 37

PG&E agrees that when we regained access to the area around the Oxbow Junction Pole during a site visit on September 22, 2022, we observed that the jumper on the lowest phase of Switch 47 did not appear to have the proper clearance from the interconnection switch rod. Prior to the Mosquito Fire, however, PG&E's records and observations indicate that there was sufficient clearance between the Oxbow Junction Pole and the jumper cable connecting the lower phases of Switches 47 and 49. Aerial photos taken on May 16, 2022 show appropriate clearance between the jumper on the lowest phase of Switch 47 and the interconnection switch rod. In addition, a PG&E transmission troubleman was at Switch 47 on August 26, 2022 and did not observe anything improper with respect to the jumpers. A different PG&E transmission troubleman was at Switch 47 on August 28, 2022. He also did not observe any issue with the jumpers. Thus, prior to the operation of Switch 47 on September 6, 2022 as part of the switching plan to increase voltage at Foresthill Substation and Oxbow Junction after the Oxbow Powerhouse tripped offline, the information available to PG&E indicated there was an adequate clearance between the jumper on the lowest phase of Switch 47 and the interconnection switch rod on the Oxbow Junction Pole. PG&E believes that on September 6, 2022, when the switch blade on the bottom phase of Switch 47 closed, the swivel and jumper moved with the blade instead of remaining stationary.

After the Mosquito Fire, we have adopted a policy requiring PG&E field personnel to be at transmission lines switches in Tier 2/3 HFTD and HFRA before re-energizing the line device when there is a Fire Potential Index (FPI) rating of R2 or above. Prior to the Mosquito Fire, PG&E's policies and procedures did not require PG&E field personnel to be in attendance for transmission switching on a dead or de-energized line or before re-energizing the transmission line device. PG&E had not identified a safety risk with re-energizing a transmission line device that had been operated on a dead or de-energized line.¹⁶ On September 6, 2022, the lines were de-energized before Switch 47 was closed. Following the Mosquito Fire, before re-energizing a transmission line device in Tier 2/3 HFTD and HFRA when there is a FPI rating of R2 or above, field personnel must confirm that the device operated properly and is in the desired position, the associated switch equipment is in the proper position and has maintained adequate clearance from grounded objects, and the device is free from ignition risk and is safe to energize. Before energizing any portion of the switch, field personnel must also have appropriate fire suppression tools.¹⁷

¹⁶ Prior to the Mosquito Fire, PG&E required field personnel to be in attendance for transmission switching on an energized line in a Fire Index Area with a FPI of R4 or above.

¹⁷ In certain situations, it may be necessary to operate a switch in an energized state. If a line switch is operated in an energized state, at FPI ratings of R2 and above, field personnel must be present and positioned at the device before operation. See TD-1400P-07-Att02, Rev. 4, Section 4 (Aug. 23, 2024).

Violation 8 – Resolution E-4184 Violation for Late Initial Notification

We respectfully disagree with this violation. Under Resolution E-4184, which was in effect on September 6, 2022,¹⁸ we were required to notify the Commission within two hours of a “reportable incident” during normal working hours (or within four hours of a reportable incident outside of normal working hours). Resolution E-4184 defined a “reportable incident” as those which: (a) “result in fatality or personal injury rising to the level of in-patient hospitalization and attributable or allegedly attributable to utility owned facilities”; (b) “are the subject of significant public attention or media coverage and are attributable or allegedly attributable to utility facilities”; or (c) “involve damage to property of the utility or others estimated to exceed \$50,000.”¹⁹ Resolution E-4184 did not require the reporting of all incidents of which we were or may have been aware.

SED’s Violation 8 does not provide a basis for its conclusion that “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.” Violation 8 notes: “PG&E staff were present at the location at about 2000 hours on that date.” But as we stated in our initial Electric Incident Report (EIR) submitted on September 8, 2022, although the USFS had placed caution tape around the base of a PG&E pole, “[t]hus far, PG&E [had] observed no damage or abnormal conditions to the pole or our facilities near Oxbow Reservoir,” and had not “observed down conductor in the area or any vegetation related issues.”

Under Resolution E-4184, we were not required to report an ignition, even one allegedly or potentially caused by our equipment, unless at least one of the criteria in Resolution E-4184 was met and the event became a “reportable incident.” Violation 8 does not state which of the criteria SED believes was met here and at what time it became a “reportable incident.”

After we first received a report of the fire on September 6, 2022, we closely monitored the situation to determine whether it would be a “reportable incident.” On September 8, 2022 at 10:05 a.m., we submitted an initial EIR out of an abundance of caution under the property damage criterion, stating that the event “may meet the property damage reporting requirements” given the significant fire progression. But even as of September 8, 2022, based on the available information, we had not definitively determined that the property damage criterion or any other reporting criteria was met. As we stated in the EIR, “The cause of the fire is under investigation. There are no reports of personal injuries. There are some preliminary reports of structure damage.” We also noted that all information in the EIR was “preliminary.” Given that we had not definitively determined that the incident was a reportable incident even when we submitted the EIR, there was no violation of Resolution E-4184.

¹⁸ Resolution E-4184 has since superseded by Resolution ESRB-12 (Dec. 19, 2024), <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/esrb/incident-investigations-web-page/resolution-esrb-12.pdf>.

¹⁹ Res. E-4184 at p. 13 (Aug. 21, 2008) (modifying D.06-04-055, Appendix B, Accident Reporting Requirements (Apr. 27, 2006)).

Please do not hesitate to contact the undersigned at (510) 246-5867 or Daniel.Kushner@PGE.com should you have any questions or concerns regarding this response.

Sincerely,

Daniel Kushner, PhD

Daniel Kushner, Ph.D.

Senior Director – Risk and Electric Compliance, Electric Engineering

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