



Public Utilities Commission
STATE OF CALIFORNIA

Citation Date: May 16, 2025
Citation #: D.16-09-055 W.25-04-001
Utility/Operator ID#: U-39

CITATION
ISSUED PURSUANT TO DECISION 16-09-055

Electrical Corporation (Utility) To Which Citation is Issued:

Pacific Gas and Electric Company (U-39)

OFFICERS OF THE RESPONDENT

Meredith Allen
Vice President, Regulatory Affairs
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA, 94619
MEAe@pge.com

CITATION

Pacific Gas and Electric Company (PG&E or Utility) is cited for ten violations, resulting in a financial penalty of \$7,149,000. On June 22, 2022, the California Public Utilities Commission (CPUC or Commission) Safety and Enforcement Division (SED) began its investigation into the Edgewood Fire under Incident Number E20220622-01 (Incident). Through its investigation, SED identified that PG&E violated General Order (GO) 95, Rule 18; GO 95, Rule 31.1; GO 95, Rule 37; and GO 95, Rule 38.

VIOLATIONS

PG&E is cited for violations of GO 95, Rule 18; GO 95, Rule 31.1; GO 95, Rule 37; and GO 95, Rule 38 as described below.

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

Companies shall undertake corrective action within the time period stated for each of the priority levels set forth below. . .

Level 1 – An immediate risk of high potential impact to safety or reliability: Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.

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 [sic] 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



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violations that create fire risk located in Tier 2 of the High Fire Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.

Level 3 – Any risk of low potential impact to safety or reliability: Take corrective action within 60 months subject to the exception specified below.

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.

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

Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the 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 38 – Minimum Clearance of Wires from Other Wires states in part:

The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.

The clearances in Table 2 shall in no case be reduced more than 10 percent, except mid-span in Tier 3 of the High Fire-Threat District where they shall be reduced by no more than 5 percent, because of temperature and loading as specified in Rule 43 or because of a difference in size or design of the supporting pins, hardware or insulators.

ENCLOSURES

The following attached enclosures were used to establish the findings of fact:

Enclosure 1 – SED’s Incident Investigation Report, dated December 13, 2023

Enclosure 2 – SED’s Notice of Violations (NOV), dated January 23, 2024

Enclosure 3 – PG&E’s Response to SED’s (NOV), dated February 22, 2024

Enclosure 4 – SED’s Supporting Documents



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STATEMENT OF FACTS

The above violations are documented in the attached Enclosure 1 – SED’s Incident Investigation Report, which is based on the following: SED’s field observations, SED’s review of PG&E’s records and responses to SED’s data requests, and SED’s review of Enclosure 3 – PG&E’s Response to SED’s Notice Inclusion of Violations in Edgewood Fire Investigation.

BACKGROUND

On June 21, 2022, at approximately 1420 hours, the Edgewood Fire ignited in Woodside, California, in a Tier 2 High Fire Threat District (HFTD). The Incident originated at a PG&E distribution interset pole, supporting the Emerald Lake 4.2kV distribution circuit (Subject Distribution Circuit), which runs directly below a span of the Jefferson-Stanford 60kV transmission circuit (Subject Transmission Circuit). The cause of the fire was most likely contact or arcing between the Subject Transmission Circuit and the Subject Distribution Circuit, due to insufficient clearance between the transmission and distribution conductors at Pole 103068309 (Incident Pole).

The Edgewood Fire burned 20 acres of wildland. There were no reports of damaged structures, but PG&E reported four firefighter injuries caused by the fire. A total of 2,733 distribution customers and one transmission customer experienced an outage before PG&E restored power at 1525 hours, on June 23, 2022. The California Department of Forestry and Fire Protection (CAL FIRE) confirmed that the fire was fully contained on June 26, 2022, at 1138 hours.

On June 22, 2022, PG&E reported the Incident to the Commission under Resolution E-4184’s media criterion. The Commission’s SED investigation of the Incident found that PG&E violated several requirements of General Order (GO) 95, Rules of Overhead Electric Line Construction.

On January 23, 2024, SED issued an NOV to PG&E (see Enclosure 2 – SED’s NOV) which included one (1) violation of GO 95, Rule 18; three (3) violations of GO 95, Rule 31.1; one (1) violation of GO 95, Rule 38. On February 22, 2024, PG&E responded with additional information and explanations of its operations in its response to SED’s NOV and alleged violations. As a result of this information, SED dismissed one violation of GO 95, Rule 31.1 which alleged that PG&E’s contracted civil construction crew should have identified a conductor clearance issue.

Violation 1

GO 95, Rule 18 requires that risks of at least moderate potential impact to safety or reliability, such as insufficient conductor clearances, be addressed within 12 months in a Tier 2 HFTD, and within 6 months in Tier 3 HFTD. PG&E failed to meet these required deadlines in three instances:

- a. On June 3, 2020, during an engineering review of Line Corrective tag number (LC) #116500147, PG&E identified an insufficient clearance of 27.6 inches between the conductors of the 60kV Jefferson-Stanford transmission circuit and the 4.2 kV Emerald Lake distribution circuit. The clearance issue was located in a Tier 2 HFTD and should have been



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completed by June 2, 2021. On May 4, 2021, PG&E created LC #120899152 to replace Pole 000/005 to address the clearance issue and assigned the work a due date of April 29, 2022. PG&E did not complete LC #120899152 within the required time frame. PG&E was in the process of replacing the pole on June 21, 2022, when the Edgewood Fire ignited. The work to address the insufficient clearance identified on June 3, 2020 was overdue by 383 days on the day the Edgewood Fire ignited.

- b. On June 30, 2020, PG&E created LC #119238762, with a due date of June 30, 2021, to address a guy wire supporting an electrical pole that was missing its fiberglass insulator. PG&E did not address the missing insulator within the required 12-month timeframe despite being in a Tier 2 HFTD. PG&E failed to complete the work until the Edgewood Fire burned the pole on June 21, 2022, and the utility replaced the pole after the fire. PG&E did not submit a request for exemption from the required time frame. The work was overdue by 356 days on the day the Edgewood Fire ignited.
- c. On June 13, 2022, PG&E created LC #123835796 (pole replacement), to address the insufficient clearance of 21.25 feet between the 12kV distribution conductors and the ground below. On September 20, 2022, PG&E created a separate Electrical Corrective tag number (EC) #124536873 (raise crossarm) to address the same issue. PG&E did not address the clearance issue within the required six-month timeframe, despite being in a Tier 3 HFTD. EC #124536873 was completed on November 28, 2023. The work was overdue by 350 days.

PG&E's failure to address these Level 2 maintenance issues by the required due date violates GO 95, Rule 18.

Violation 2

GO 95, Rule 31.1 requires that utilities follow accepted good practices for the design, construction, and maintenance of their electric facilities, which extends to requiring utilities to follow their internal procedures as accepted good practices.

- a. PG&E created LC #120899152 to address the insufficient clearance identified at the Edgewood Fire and assigned it Priority E with a 12-month due date. The PG&E Electrical Transmission Preventative Maintenance (ETPM) Manual states that if circuit-to-circuit clearances exceed the values specified by the utility's standard, the work must be assigned Priority B with a 3-month due date.

PG&E's failure to follow its ETPM Manual by failing to assign the correct internal priority to a work order which identified an insufficient clearance violates GO 95, Rule 31.1.

- b. PG&E's Electrical Distribution Preventative Maintenance (EDPM) and Electric Transmission Preventative Maintenance (ETPM) Manuals both state that distribution and transmission patrols and inspections (including aerial inspections) are intended to identify conductor clearance issues.

Despite LIDAR data confirming that an insufficient conductor clearance condition was present at the Incident Location as early as September 2016, the following separate patrols and inspections at the Incident Location did not identify any conductor clearance issues:



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1. Distribution GO 165 Patrol, April 2017
2. Transmission GO 165 Patrol, August 2017
3. Distribution GO 165 Patrol, February 2018
4. Transmission GO 165 Inspection, August 2018
5. Transmission WSIP, January 2019
6. Distribution WSIP-100324166, March 2019
7. Distribution WSIP-100324168, March 2019
8. Distribution GO 165 Patrol, April 2019
9. Distribution WSIP-103068309, April 2019
10. Transmission Drone Inspection, June 2019
11. Transmission GO 165 Patrol, August 2019
12. Distribution GO 165 Patrol, June 2020
13. Distribution GO 165 Inspection, August 2020
14. Transmission GO 165 Aerial (helicopter) Inspection, September 2020
15. Distribution GO 165 Patrol, March 2021
16. Transmission GO 165 Patrol, May 2021
17. Transmission Detailed Aerial (drone) Inspection, March 2022
18. Transmission GO 165 Inspection, June 2022
19. Distribution GO 165 Patrol, June 2022

PG&E's failure to identify conductor clearance issues during 19 patrols and inspections as required by the utility's EDPM and ETPM Manuals violates GO 95, Rule 31.1.

Violation 3

GO 95, Rule 38 establishes the necessary minimum clearance requirements for safe operation of electric facility wires from other wires in Table 2. PG&E identified multiple instances of open work orders to address conductor clearance which did not meet these minimum requirements.

- a. Table 2 of GO 95, Rule 38 states that the basic minimum clearance is 96 inches for wires, cables, and conductors not supported on the same poles, for supply conductors between 750 – 7,500 volts and supply conductors between 35,000 – 75,000 volts.

A LIDAR scan first identified a 69.6-inch clearance at the Incident Location on September 28, 2016. PG&E later identified a 27.6-inch clearance between the Emerald Lake 4.2kV distribution circuit and the Jefferson-Stanford 60kV transmission circuit at the Incident Location on June 3, 2020, during an engineering review of a work order. PG&E failed to maintain the minimum clearance requirements for 2092 days after identification until the date of the Edgewood Fire on June 21, 2022.

- b. LC #124254305 identified a 44-inch clearance between a 12kV conductor and a 60kV conductor on August 9, 2022, which is less than the 96-inch clearance required by GO 95, Rule 38. LC #124254305 was completed on October 22, 2022. PG&E failed to maintain the minimum clearance requirements for 75 days after identification.



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- c. LC #118014477, LC #118014490, and LC #118014473 identified a 44-inch clearance between a 4kV conductor and a 115kV conductor on October 17, 2019. The clearance was below the required basic minimum clearance required by GO 95, Rule 38, until the work order was completed on October 3, 2022. PG&E failed to maintain the minimum clearance requirements for 1,082 days after identification.

PG&E's failures to maintain the clearances required by Table 2 violates GO 95, Rule 38.

Violation 4

GO 95, Rule 37 establishes the necessary minimum clearance requirements for safe operation of electric facility wires from the ground or other surfaces in Table 1. PG&E identified multiple instances of open work orders to address conductor clearance which did not meet these minimum requirements:

- a. LC #123431936, LC #123432042, and LC #123432044 identified a 21.33-foot clearance between the 60kV conductors and the ground below, which is less than the required 30-foot clearance required by GO 95, Rule 37, on April 26, 2022, until the work was completed on April 17, 2025. PG&E failed to meet the minimum clearance requirements for 1,087 days after identification under LC #123431936.
- b. On June 13, 2022, PG&E created LC #123835796 (pole replacement) to address the insufficient clearance of 21.25 feet between the 12kV distribution conductors and the ground below, which is less than the 25-foot clearance required by GO 95, Rule, 37. On September 20, 2022, PG&E created EC #124536873 (raise crossarm) to address the same issue. PG&E did not address the clearance issue within the required six-month timeframe, despite being in a Tier 3 HFTD. EC #124536873 was completed on November 28, 2023. PG&E failed to meet the minimum clearance requirements for 533 days after its original identification under LC #123835796.

PG&E's failure to maintain the minimum clearances required by Table 1 violates GO 95, Rule 37 Table 1.

SED CITATION ANALYSIS



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Element	Staff Finding
Number of violations and duration of violations	<p>Violation 1.a, GO 95, Rule 18 for 383 days beginning on June 3, 2021, and ending on June 21, 2022.</p> <p>Violation 1.b, GO 95, Rule 18 for 356 days beginning on June 30, 2021, and ending on June 21, 2022.</p> <p>Violation 1.c, GO 95, Rule 18 for 350 days beginning on December 13, 2022, and ending on November 28, 2023.</p> <p>Violation 2.a, GO 95, Rule 31.1 for a single day (May 4, 2021).</p> <p>Violation 2.b, GO 95, Rule 31.1 in 19 instances.</p> <p>Violation 3.a, GO 95, Rule 38 for 2092 days beginning on September 28, 2016 and ending on June 21, 2022.</p> <p>Violation 3.b, GO 95, Rule 38 for 75 days beginning on August 9, 2022, and ending on October 23, 2022.</p> <p>Violation 3.c, GO 95, Rule 38 for 1,082 days beginning on October 17, 2019, and ending on October 3, 2022.</p> <p>Violation 4.a, GO 95, Rule 37 for 1,087 days beginning on April 26, 2022, and ending on April 17, 2025.</p> <p>Violation 4.b, GO 95, Rule 37 for 533 days beginning on June 13, 2022, and ending on November 28, 2023.</p>
Severity or gravity of the offense	<p>Economic Harm: 20 acres of wildland burned, 2,733 distribution and one transmission customer deenergized, \$1,898,560 dollars in property damage to utility facilities.</p> <p>Physical Harm: The incident resulted in four firefighter injuries.</p> <p>Regulatory Harm/Number of Violations: Ten violations of GO 95.</p>



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Element	Staff Finding
Conduct of the utility	<p>Violation 1:</p> <p>GO 95, Rule 18 requires that risks of at least moderate potential impact to safety or reliability, such as insufficient conductor clearances, be addressed within 12 months in a Tier 2 HFTD, and within six months in Tier 3 HFTD. PG&E failed to meet these required deadlines in three instances. PG&E's failure to address these Level 2 maintenance issues by the required due date violates GO 95, Rule 18.</p> <p>Violation 2:</p> <p>GO 95, Rule 31.1 requires that utilities follow accepted good practices for the design, construction, and maintenance of their electric facilities, which extends to requiring utilities to follow their internal procedures as accepted good practices.</p> <p>The PG&E ETPM Manual states that if circuit-to-circuit clearances exceed the values specified by the utility's standard, the work must be assigned Priority B with a three-month due date. PG&E created LC #120899152 to address the insufficient clearance identified at the Incident Location but assigned it Priority E with a 12-month due date. PG&E's failure to follow its ETPM Manual by failing to assign the correct internal priority to a work order which identified an insufficient clearance violates GO 95, Rule 31.1.</p> <p>PG&E's EDPM and ETPM Manuals both state that distribution and transmission patrols and inspections (including aerial inspections) are intended to identify conductor clearance issues. PG&E's 19 patrols and inspections failed to identify conductor clearance issues which violates GO 95, Rule 31.1.</p>



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Element	Staff Finding
Conduct of the utility (continued)	<p>Violation 3:</p> <p>GO 95, Rule 38, establishes the necessary minimum clearance requirements for safe operation of electric facility wires from other wires in Table 2. PG&E failed to meet these required minimum clearances in three instances. PG&E's failure to maintain the clearance violates GO 95, Rule 38.</p> <p>Violation 4:</p> <p>GO 95, Rule 37, establishes the necessary minimum clearance requirements for safe operation of electric facility wires from the ground or other surfaces in Table 1. PG&E failed to meet these required minimum clearances in two instances. PG&E's failure to maintain the minimum clearances violates GO 95, Rule 37.</p>



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Element	Staff Finding
Prior history of similar violation(s)	<p>SED's incident investigations have found PG&E failed to meet the requirements of GO 95, Rule 18; GO 95, Rule 31.1; GO 95, Rule 37; and GO 95, Rule 38 on other occasions. Examples include:</p> <p>E20211223-01: On July 7, 2021, in Grass Valley, CA an overheated piece of equipment from a PG&E pole ignited the Brewer Fire. The fire burned approximately 5.5 acres. SED found PG&E in violation of GO 95, Rule 18 for failing to complete a work order in a HFTD by the required timeline and found PG&E in violation of GO 95, Rule 31.1 for failing to comply with its internal procedures to address work orders in a timely manner.</p> <p>E20210713-01: On July 13, 2021, in Butte County, CA a tree fell and caused electrical conductors owned and operated by PG&E to make contact and ignited the Dixie Fire. The Dixie Fire burned 963,309 acres, destroyed 1,311 structures, damaged 94 additional structures and caused four injuries. SED found PG&E in violation of GO 95, Rule 18 for failing to complete a work order by the required due date and found PG&E in violation of GO 95, Rule 31.1 for failing to maintain its 12kV overhead conductors safely by failing to identify the hazardous tree condition.</p> <p>E20220329-01: On March 29, 2022, in Livermore, CA, palm fronds fell from a palm tree and created a bridge between the 12 kV distribution line and the 60 kV transmission line, which caused a power surge along the Livermore 1101 12 kV distribution line. SED found PG&E in violation of GO 95, Rule 38 for failing to maintain the required minimum clearance between its lines.</p> <p>E20201109-01: On June 4, 2020, in Loleta, CA, a large farm machinery vehicle contacted 12 kV overhead conductors on PG&E's Eel River 1102 distribution circuit causing injury to the vehicle operator. SED found PG&E in violation of GO 95, Rule 37 for failing to maintain sufficient vertical clearance between its conductors and the ground.</p>



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Element	Staff Finding
Self-reporting of the violation	PG&E self-reported the Edgewood Fire under the media coverage criterion set forth in Resolution E-4184 (August 21, 2008). After PG&E self-reported this incident, SED followed up with an incident investigation.
Financial resources of the utility	PG&E provides natural gas and electric service to approximately 16 million people. PG&E's annual revenue in 2024 was \$24.4 billion.
The totality of the circumstances	<p>Aggravating factors include:</p> <ul style="list-style-type: none">• Four fire fighters injured.• 20 acres of wildland burned, 2,733 distribution and one transmission customer deenergized, \$1,898,560 dollars in property damage to utility facilities. <p>Mitigating factors include:</p> <ul style="list-style-type: none">• PG&E's general cooperation with SED for the duration of the investigation.• PG&E acknowledged and agreed with four of the violations in its response to SED's NOV letter. <p>Circumstantial factors include:</p> <ul style="list-style-type: none">• PG&E self-reported this incident under media coverage criterion set forth in Resolution E-4184.
The role of precedent	As described above in the "Prior History of Similar Violations" section, the CPUC has issued citations to PG&E for violations of GO 95, Rule 18 and GO 95, Rule 31.1, and issued NOV's to PG&E for violations of GO 95, Rule 37 and GO 95, Rule 38.



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Element	Staff Finding
Resultant citation taking all of these factors into account	The penalty is \$7,149,000 consistent with the administrative limit on citations adopted in D.16-09-055, Phase Two Decision (Sept. 30, 2016).



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RESPONSE:

Respondent is called upon to provide a response to this Citation by: **5:00 PM on June 16, 2025**. By way of such response, Respondent, **within 30 calendar days**, must either pay the amount of the penalty set forth in this citation,¹ or appeal² the citation. In addition, the Respondent must do one of the following:

- 1) For violations constituting immediate safety hazards: Respondent must immediately correct the immediate safety hazards.
- 2) For violations that do not constitute immediate safety hazards: Violations that do not constitute immediate safety hazards must be corrected within 30 days after the citation is served. If said violations that do not constitute immediate safety hazards cannot be corrected within 30 days, then the Respondent must submit a detailed Compliance Plan to the Director of SED within 30 days after the citation issues, unless the utility and the Director of SED, before the expiration of the 30-day period, agree in writing to another date, reflecting the soonest that the Respondent can correct the violations. The Compliance Plan must provide a detailed description of when the violation will be corrected, the methodology to be utilized, and a statement supported by a declaration from the Respondent's Chief Executive Officer or appropriate designee (CEO Declaration) stating that in the Respondent's best judgment, the time that will be taken to correct the violation will not affect the safety or integrity of the operating system or endanger public safety.

Note: Respondent will forfeit the right to appeal the citation by failing to do one of the options outlined above within 30 days. Payment of a citation or filing a Notice of Appeal does not excuse the Respondent from curing the violation. The amount of the penalty may continue to accrue until a Notice of Appeal is filed. Penalties are stayed during the appeal process. A late payment will be subject to a penalty of 10% per year, compounded daily and to be assessed beginning the calendar day following the payment-due date. The Commission may take additional action to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

¹ For fines paid pursuant to Public Utilities Code (Pub. Util. Code) Section 2107 and Decision (D.) 16-09-055 Respondent shall submit a certified check or wire transfer payable to California Public Utilities Commission using the attached Citation Payment Form. Upon payment, the fine will be deposited in the State Treasury to the credit of the General Fund and this citation will become final.

² Respondent may Appeal this citation by completing and submitting a Notice of Appeal Form. Please see the attached document, "Directions For Submitting An Appeal To A Citation Issued Pursuant to Decision 16-09-055" for information on the appeals process and the attached "Notice of Appeal Of Citation Form."



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NOTIFICATION TO LOCAL AUTHORITIES:

As soon as is reasonable and necessary, and no later than 10 calendar days after service of the citation is effected, Respondent must provide a notification to the Chief Administrative Officer or similar authority in the city and county where the violation occurred. Within 10 days of providing such notification, Respondent must serve an affidavit to the Director of SED, at the mail or e-mail address noted below, attesting that the local authorities have been notified; the date(s) for when notification was provided; and the name(s) and contact information for each local authority so notified.

The CPUC expects the Utility to take actions, as soon as feasible, to correct, mitigate, or otherwise make safe all violations noted on the Citation regardless of the Utility's intentions to accept or appeal the violation(s) noted in the Citation.

Lee Palmer
Director

Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Leslie.Palmer@cpuc.ca.gov



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CITATION PAYMENT FORM

I (we) _____ hereby agree to comply with this citation dated _____,
and have corrected/mitigated the violation(s) noted in the citation on _____ and no later
than _____, _____ all work to make permanent corrections to any mitigated, or
otherwise remaining concerns related to the violation(s) will be completed as noted in the
Compliance Plan we have submitted to the Director of SED and, herewith, pay a fine in the
amount of
\$ _____ as included in the citation.

Signature of Electrical Corporation's Treasurer, Chief
Financial Officer, or President/Chief Executive Officer, or
delegated Officer thereof

(Signature)

(Date)

(Printed Name and Title)

Payment must be with a certified check or wire transfer made payable to the **California Public Utilities Commission** and sent to the below address. Please include the citation number on the memorandum line of the check or money transfer to ensure your payment is properly applied.

California Public Utilities Commission
Attn: Fiscal Office
505 Van Ness Avenue
San Francisco, CA 94102-3298

NOTE: A copy of the completed Citation Payment Form must be sent to the Director of the Safety and Enforcement Division, via email or regular mail, to the address provided on the Citation.



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DIRECTIONS FOR SUBMITTING AN APPEAL TO A CITATION ISSUED PURSUANT TO DECISION 16-09-055

Within 30 calendar days of the Respondent being served with a **CITATION ISSUED PURSUANT TO DECISION 16-09-055**, Respondent may appeal the citation. Beyond 30 calendar days of being served with the citation, Respondent is in default and, as a result, is considered as having forfeited rights to appeal the citation. The Respondent must still correct the violation(s) as instructed in the Response section of this citation.

To appeal the citation, Appellant must file a Notice of Appeal (including a completed title page complying with Rule 1.6 of the Commission's Rules of Practice and Procedure, and attached Notice of Appeal Form) along with copies of any materials the Appellant wants to provide in support of its appeal with the Commission's Docket Office **and** must serve the Notice of Appeal, at a minimum, on:

- 1) The Chief Administrative Law Judge (with an electronic copy to: ALJ_Div_Appeals_Coordinator@cpuc.ca.gov),
- 2) The Director of the Safety and Enforcement Division
- 3) The Executive Director of the California Public Utilities Commission
- 4) General Counsel
- 5) The Director of the Public Advocates Office at the California Public Utilities Commission

at the address listed below within 30 calendar days of the date on which the Appellant is served the Citation. The Appellant must file a proof of service to this effect at the same time the Appellant files the Notice of Appeal. The Notice of Appeal must at a minimum state: (a) the date of the citation that is appealed; and (b) the rationale for the appeal with specificity on all grounds for the appeal of the citation.

***California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Attn: Lee Palmer***

NOTE: Submission of a *Notice of Appeal Form* in no way diminishes Appellant's responsibility for correcting the violation described in the citation, or otherwise ensuring the safety of facilities or conditions that underlie the violations noted in the Citation.

Ex Parte Communications as defined by Rule 8.1(c) of the Commission's Rules of Practice and Procedure, are prohibited from the date the citation is issued through the date a final order is issued on the citation appeal.



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After receipt of the Appellant's *Notice of Appeal Form*, a hearing will be convened before an Administrative Law Judge. At least ten days before the date of the hearing, the Appellant will be notified and provided with the location, date, and time for the hearing. At the hearing,

- (a) Appellant may be represented by an attorney or other representative, but any such representation shall be at the sole expense of the Appellant;
- (b) Appellant may request a transcript of the hearing, but must pay for the cost of the transcript in accordance with the Commission's usual procedures;
- (c) Appellant is entitled to the services of an interpreter at the Commission's expense upon written request to the Chief Administrative Law Judge not less than five business days prior to the date of the hearing;
- (d) Appellant is entitled to a copy of or electronic reference to "Resolution ALJ-377 Modifies and Makes Permanent the Citation Appellate Rules and General Order I56 Appellate Rules (Citation Appellate Rules)"; and
- (e) Appellant may bring documents to offer in evidence (Rule 13.6 (Evidence) of the Commission's Rules of Practice and Procedure applies) and/or call witnesses to testify on Appellant's behalf. At the Commission's discretion, the hearing in regard to the Appellant's appeal can be held in a CPUC hearing room at either of the following locations:

San Francisco:

505 Van Ness Avenue
San Francisco, CA 94102

Los Angeles:

320 West 4th Street, Suite 500
Los Angeles, CA 90013

The hearing(s) held in regard to the Appellant's appeal will be adjudicated in conformance with all applicable Public Utilities Code requirements.



Public Utilities Commission
STATE OF CALIFORNIA

Citation Date: May 16, 2025
Citation #: D.16-09-055 W.25-04-001
Utility/Operator ID#: U-39

Notice of Appeal Form
Appeal from Citation issued by Safety and Enforcement Division
(Pursuant to Decision 16-09-055)

Appellant:

[Name]

[Title]

[Utility Name]

[Mailing Address]

[City, CA Zip Code]

Citation Date: _____

Citation #: D.16-09-055 ____-____-____

Utility/Operator ID#: _____

Appeal Date: _____

“Appeal of _____ from _____
[Utility/Operator Name] [Citation Number]

Issued by the Safety and Enforcement Division”

Statements supporting Appellant’s Appeal of Citation (You may use additional pages if needed and/or attach copies of supporting materials along with this form).



Public Utilities Commission
STATE OF CALIFORNIA

Citation Date: May 16, 2025

Citation #: D.16-09-055 W.25-04-001

Utility/Operator ID#: U-39

Enclosures to Accompany Utility Appeal

Utility to add list of Enclosures as appropriate: