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February 22, 2024

Anthony Noll

Program Manager
Wildfire Safety and Enforcement Branch
California Public Utilities Commission (CPUC)

Reference: CPUC-ID: E20220622-01
Notice of Violation: General Order (GO) 95, Rule 18, Rule 31.1, Rule 37, Rule 38, and Public Utilities Code, Section 451.

Dear Mr. Noll:

This letter is in response to the above referenced Notice of Violation (NOV) dated January 23, 2024, regarding the investigation of the Safety and Enforcement Division (SED) into a 20-acre fire, known as the Edgewood Fire, that ignited on June 21, 2022 adjacent to and southwest of [redacted], Woodside, San Mateo County, California (the Incident Location).

The NOV cites the following violations:

> One (1) violation of General Order (GO) 95, Rule 18; three (3) violations of GO 95 Rule 31.1; one (1) violation of GO 95, Rule 38; and one (1) violation of the Public Utilities Code Section 451.[1]

The SED investigation identified the following violations:

Violation 1: GO 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.

[1] The violation of Public Utilities Code Section 451 is based on PG&E's failure to remedy several conductor clearances that did not meet the minimum requirements of GO 95, Rules 37 and 38.

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 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 exceptions as specified in Appendix J of GO 95].

Violation 2 & 3 & 4: GO 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.

Violation 5: GO 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.

Violation 6: Public Utilities Code Section 451 states in part:

Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities, as defined in Section 54.1 of the Civil Code, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.

GO 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.

SED alleges two instances of work orders not being completed timely at or near the Incident Location and one instance of work being completed late in the Humboldt Division resulting in a violation of GO 95, Rule 18. SED alleges that we violated GO 95, Rule 31.1 by (1) not assigning the correct due date for a work order at or near the Incident Location; (2) failing to recognize and address potential hazards during pole excavation next to Pole 000/005 at the Incident Location span; and (3) failing to identify insufficient clearance between transmission and distribution conductors at the Incident Location from approximately April 2017 to July 2022. SED also alleges that insufficient clearance between the transmission and distribution conductors at the Incident Location resulted in a violation of the clearance standards of GO 95 Rule 38. Finally, SED alleges that we created a risk to public safety, in violation of Public Utilities Code Section 451, by failing to maintain the conductor clearances required by GO 95, Rule 37 and 38 at the Incident Location and in separate locations in East Palo Alto, Daly City, and Humboldt County.

We address each of SED's identified violations in detail below. We also describe corrective actions we have taken in response to several of the issues described in the NOV.

Background

On June 21, 2022, at 1420 hours, we became aware of an interruption on our Jefferson-Stanford 60 kV Transmission Line when the line relayed and did not reclose due to automatic reclosing being disabled for wildfire mitigation. Also, at approximately 1420 hours, Emerald Lake Substation Circuit Breaker ("CB") 401, Emerald Lake 402 Line Recloser ("LR") 8872, and Las Pulgas Substation CB 401 tripped open, resulting in outages on the Emerald Lake 0401 4kV, Emerald Lake 0402 4kV, and Las Pulgas 0401 4kV Circuits respectively. As a result of these events, one transmission customer and 2,733 distribution customers were out of power.

At 1437 hours, a PG&E Transmission Troubleshooter ("Troubleshooter #1") dispatched in response to the transmission interruption called our Grid Control Center to report a fire outside the Emerald Lake Substation, near [redacted] in Redwood City. Troubleshooter #1 also reported observing a local fire department arriving on scene. This fire was named the Colton Fire, which was reported by local media to have burned less than an acre and was contained by 1600 hours on June 21, 2022.

At that same time, Troubleshooter #1 reported a second fire down the hill to the southwest towards Jefferson Substation between Jefferson-Stanford 60 kV Poles 000/004 and 000/005 ("Poles 000/004 and 000/005"). These poles support a span of conductors on the Jefferson-Stanford 60kV Transmission Circuit and distribution underbuild conductors from the Emerald Lake 0401 4kV Distribution Circuit. A distribution only pole with SAP ID 103068309 ("Pole 103068309") is interset[2] between Poles 000/004 and 000/005 and supports the Emerald Lake 0401 conductors. The fire near Pole 000/004 was named the Edgewood Fire.

We reported the Edgewood Fire to the CPUC on June 22, 2022 under the media criterion due to a number of Bay Area news organizations reporting on the incident. According to the CAL FIRE website, the Edgewood fire burned 20 acres and was contained on June 26, 2022 at 1138 hours.

[2] Interset refers to a distribution-only pole set under a span of transmission conductors.

We are aware of a contract crew that was performing work for PG&E at Pole 000/005 adjacent to the address of [redacted], Woodside, on the morning of June 21, 2022, prior to the incidents described above. The crew arrived on scene at about 0700 hours and departed the scene at about 1230 hours. The scope of work for that morning was to drill a hole on the north-west side of Pole 000/005, in line with the overhead conductors so that on the following day Pole 000/005 could be replaced with a steel pole by a different PG&E contract crew. The hole was drilled to approximately 14 feet depth, 36 inches in diameter, and was about 3 feet away from Pole 000/005. The crew performing this work said they did not encounter any problems during their work and did not make contact with Pole 000/005 or with the pole guy wires or conductors during the drilling operation. The crew reported that it did not observe any issues with Pole 000/005 or any abnormal issues with the site, their equipment, or the soil during their work.

The following day, June 22, 2022, a different contract crew arrived to install the new Pole 000/005 adjacent to [redacted], Woodside. The crew collected the new steel pole at the Jefferson substation and transported it to the site adjacent to [redacted]. The crew started to do their work when they were stopped by CAL FIRE personnel and told not to proceed.

The Line Correction ("LC") Notification that ultimately led to the work to replace Pole 000/005 (LC# 120899152) began as a LC Notification for a bent guy-wire anchor head at Pole 000/005 (LC# 116500147). This notification (LC# 116500147) was created on February 19, 2019 as a result of an inspection. During an engineering review of this notification, PG&E determined that Pole 000/005 required replacement due to pole loading. Engineering review of the notification also found that there was insufficient clearance between the transmission span between Poles 000/005 and 000/004 and the distribution interset Pole 103068309 underneath it. New anchors and anchor rods were installed at Pole 000/005 on June 22, 2021 under LC# 116500147. Since the pole replacement work was still outstanding, LC#120899152 was created. PG&E then worked with the customer whose property adjoins the proposed new location for Pole 000/005 to address the customer's concerns regarding pole and guy wire placement. The final design for the replacement of Pole 000/005 was completed and approved on May 13, 2022. The pole was replaced—and the insufficient clearance was addressed—following the Edgewood Fire on June 26, 2022.

Our Response

Violation 1 – GO 95, Rule 18

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

1. We agree that the insufficient clearance between the conductors of the 60kV Jefferson-Stanford transmission circuit and the 4.2 kV Emerald Lake distribution circuit was not remedied within a year. We created tag #120899152 on 04/29/2021[3] to replace Pole 000/005 which would have corrected the identified pole loading and clearance issue. We performed a Field Safety Reassessment (FSR) of the tag on 06/03/2022 to determine if the potential risk from the clearance issue had worsened in condition and needed to be escalated to a higher priority tag. The pole replacement was scheduled to take place on the day after the Edgewood

[3] As referenced in the NOV letter, this maintenance tag was released as a LC notification on May 4, 2021.

Fire. We ultimately replaced Pole 000/005 and corrected the line clearance issue on 06/26/2022.

Please see the discussion below regarding PG&E's maintenance tag backlog and our plan to address it.

2. We agree that (LC) tag #119238762 was not completed within twelve months. We created the tag on 06/30/2020 to address a missing fiberglass insulator on a guy wire supporting a pole adjacent to the Edgewood Fire Incident Location Pole 000/004 on the Jefferson-Stanford 60kV circuit. We performed a FSR of this issue on 03/29/2021, 06/17/2022, and after this incident on 08/15/2022 to determine if the condition had worsened and needed to be escalated to a higher priority tag. We completed the work for this tag on 09/29/2022.

   Please see the discussion below regarding PG&E's maintenance tag backlog and our plan to address it.

3. We agree that (EC) tag #124536873 was not completed within six months. We created this tag on 09/20/2022[4] to address the insufficient clearance between a 12kV distribution conductor and the ground below. This tag was completed on 11/28/2023. We note that the location for this work is in Humboldt County and is not associated with the Edgewood Fire.

   Please see the discussion below regarding PG&E's maintenance tag backlog and our plan to address it.

As discussed below, electric transmission (LC) or electric distribution (EC) maintenance tags that are past due, or nearing their completion deadline, are addressed through our maintenance tag backlog programs explained in detail in our 2023-2025 Wildfire Mitigation Plan (WMP). The goal of these programs is to manage risk associated with open tags while we work to efficiently reduce the number of open maintenance tags using a risk prioritization approach. We describe our approach to addressing open transmission and distribution tags below.

Transmission (LC) tags[5]

Prioritization of open work orders (notifications) is based on our priority levels A, B, E, and F as defined in our ETPM Manual, TD-1001M. To better and more clearly align with the CPUC's Level 1, 2, 3 priority levels, the B priority for transmission line notifications was phased out, and existing open B-priority notifications at the start of 2023 were either closed out in 2023 or re-assessed and reassigned as appropriate. Priority A, E, and F now align with CPUC's Level 1, 2, 3 respectively. A significant increase in the number of notifications created since 2019 has led to a backlog of E and F notifications requiring additional prioritization. Per PG&E's Transmission LC Notification Strategy Procedure (TD-8123P-101), ignition-related notifications in HFTD and HFRA areas have a higher priority than non-HFTD and non-HFRA, and non-ignition-related notifications.

[4] The NOV incorrectly states that this maintenance tag was created on June 13, 2022.

[5] This language is an excerpt from PG&E's 2023-2025 WMP (R4), Section 8.1.7.1, p. 530 that has been updated in response to this NOV.

Our 2022 work plan included completing all HFTD and HFRA ignition-related notifications found in 2021 or earlier, barring external factors. Since this plan contained and mitigated most open ignition-related notifications, there was no further prioritization by wildfire risk at the notification level. To enable efficient execution, Level E and F notifications were not always repaired by their required deadline, and instead were managed to a target for the end of 2022.

Notifications found before 2023 were managed similarly, with ignition-related notifications in HFTD or HFRA locations planned to be repaired in 2023 (16,831 notifications), or their required end date if it was after 2023. These 16,831 notifications were closed in 2023, except for 762 notifications delayed due to external factors as defined in the 2023-2025 WMP. The 762 remaining notifications are scheduled for completion in 2024 and will continue to be tracked. HFTD or HFRA non-ignition-related notifications opened before 2023 will be repaired opportunistically over the five years from 2023-2027, bundling the work with ignition-related notifications on the same structure or circuit when practical. These actions enabled us to bundle and execute work more efficiently to help reduce the backlog of HFTD and HFRA notifications by the end of 2023.

Starting in 2023, new HFTD and HFRA notifications were targeted for repair by their required end date. We will continue to target completion of these notifications by their required end date in 2024. There will continue to be a backlog of notifications in non-HFTD areas that will be prioritized based on non-wildfire risk and monitored for condition escalation through FSRs.

Distribution (EC) tags[6]

In 2019, we began the Wildfire Safety Inspection Program (WSIP) to proactively expand inspections of poles and associated equipment in HFTD/HFRA areas on an accelerated and enhanced basis to mitigate ignition risk. The WSIP inspections led to a significant increase in the volume of notifications. Along with the WSIP inspections, other programs added notifications to the backlog such as Pole Test and Treat, Post-Event Patrols, Patrol Inspections, and Infrared Inspections.

At the end of 2022, we had approximately 260,000 notifications in our distribution HFRA/HFTD backlog. Most of the outstanding tags are priority E and F tags. E and F tags represent conditions considered to have a moderate (E tag) or low (F tag) potential safety or reliability impact. We have developed a plan to reduce the wildfire risk associated with the backlog of ignition-risk tags in HFTD/HFRA by 77 percent at the end of the 2023-2025 WMP cycle. More specifically:

- We will reduce 68 percent of the wildfire risk associated with backlog ignition risk tags in HFTD/HFRA by the end of 2024, barring external factors.

- We will reduce 77 percent of the wildfire risk associated with backlog ignition risk tags in HFTD/HFRA by the end of 2025, barring external factors.

[6] This is an excerpt from PG&E's 2023-2025 WMP (R4), Section 8.1.7.2, p. 532 that has been updated in response to this NOV.

In the narrative, beginning on page 536 in Section 8.1.7.2 of the 2023-2025 WMP, we describe how we prioritize distribution work orders based on risk, explain our risk-informed plan for eliminating the backlog of ignition-risk tags in the HFTD/HFRA, and analyze our open work orders. Please see the 2023-2025 WMP[7] for additional details. Using this plan, PG&E reduced the wildfire risk associated with ignition risk backlog tags by more than 52% in 2023.[8]

Violation 2 – GO 95, Rule 31.1

We agree that the pole replacement LC tag #120899152 created on 4/29/2021 for Pole 000/005 on the Jefferson-Stanford 60kV circuit should have been a Priority B tag with a three-month correction timeline based on PG&E internal requirements, Table 4 in PG&E's Electric Transmission Preventative Maintenance (ETPM) Manual. Instead, we assigned a 12-month due date. Please note that a 12-month due date meets GO Rule 18 requirements. This LC tag was ultimately completed on 06/26/2022 following the Edgewood Fire.

The job package for the pole replacement for Pole 000/005 (LC tag #120899152) went through several redesigns largely due to customer complaint issues. During this time, the job package was prioritized for work based on the required anchor pole replacement rather than the need to address any potential clearance issues. Since the Edgewood Fire, PG&E transmission engineering has closed this process gap. Engineering findings are now collected, stored, and then processed for transmission tag creation. We create transmission tags to track each significant finding of corrective work. These transmission tags are assigned individual prioritization and then bundled to the same construction package. PG&E is memorializing these new work procedures as part of our revision to the Engineering Guidance Document TD-3330 Substation and Transmission Line Engineering Process Overview. This will ensure that all identified conditions and mitigations are more visible.

Violation 3 – GO 95, Rule 31.1

We respectfully disagree with this violation. While we acknowledge that the subcontracted crew assigned to auger the new pole hole adjacent to Pole 000/005 did not identify the insufficient clearance between the conductors adjacent to the Incident Location, their scope of work did not require them to do so. PG&E's Excavation Safety Manual, TD-4621M, which serves as the basis for this violation, was created by PG&E Gas Operations and it generally applies to excavations personnel enter to perform work. This includes larger-scale excavation work such as trenching or digging near a retaining wall or in a more complex geotechnical environment. It did not apply to the subcontracted electric crew assigned to auger the new pole hole adjacent to Pole 000/005.[9] Moreover, even if TD-4621M had applied, Part 3, Section

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[7] See PG&E's 2023-2025 WMP on the OEIS website: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true

[8] Please see Target GM-03 in PG&E's 2023-2025 WMP Fourth Quarter Data Report located at Community Wildfire Safety Program (pge.com).

[9] PG&E acknowledges that in prior data responses to SED, we incorrectly identified TD-4621M as an applicable standard for electric crews performing pole replacement work. We discovered this in preparation of the response to this NOV, and we will amend our prior responses to correct this inaccuracy. The crew augering the new pole hole on June 21, 2022 worked pursuant to the California Occupational Safety and Health Standards for Excavations found in California Code of Regulations, Title 8, Sections 1504 and 1539-1543.

1.4 of the standard, referenced by SED, identifies potential hazards during excavation work that "could cause electric utility structures to become unstable or fall."[10] These potential hazards relate to excavation safety rather than electric issues like conductor clearance. Therefore, it is unlikely that adherence to TD-4621M would have revealed the conductor clearance situation at issue here.

The sub-contracted personnel assigned to auger the new pole hole adjacent to Pole 000/005 met the requirements to perform their assigned work safely. The crew performed a tailboard briefing and assessed the jobsite conditions for hazards or other potential issues within their scope of work before they moved their equipment into position to auger the new pole hole. Page 3 of the tailboard form (previously provided to the CPUC on 02/17/2023 in DRU-11277, in response to Question 11) indicates that their project did not include any work within 10 feet of any electrical conductors. Accordingly, a qualified electrical worker was not required to be present. As alluded to above, we would not expect the civil crew to identify conductor clearance issues between the Jefferson-Stanford 60kV transmission circuit and the Emerald Lake 4.2kV distribution circuit at an interset distribution pole approximately 500 feet down a ravine when the crew's work did not involve any contact with conductors and we believe did not involve the adjacent pole, guy wires, or any equipment conditions in the adjacent spans.

Violation 4 – GO 95, Rule 31.1

We agree that our transmission and distribution patrols and inspections programs did not identify an inadequate conductor clearance between the Jefferson-Stanford 60kV transmission conductors and the Distribution Emerald Lake 0401 conductors between Pole 000/004 and 000/005 between April 2017 and June 2022. However, as noted in SED's Violation 5, we identified the clearance concern on 06/03/2020 during an engineering review of a work order. As noted in the background section of this NOV response above, we planned to address this issue as part of a replacement project for Pole 000/005. The final design for the replacement of Pole 000/005 was completed and approved on 05/13/2022. The pole replacement project was then planned to be completed the day after the Edgewood Fire ignited.

Following the Edgewood Fire, we expanded the Distribution Patrols and Inspection Job Aid (TD-2305MJA2, Rev 11) to include more explanations and example photos of conductor clearance issues to aid PG&E employees and contract partners in performing their job duties. We have also added laser rangefinders to the toolkit to assist in measuring distances for all distribution compliance inspectors. During both New and Refresher trainings for Distribution Compliance Inspectors, we include detailed review of the OH inspection job aid clearance section and examples to ensure understanding and expectations to look for clearance issues during inspections and patrols. For transmission inspections, we improved the Identifying Conductor and Clearance Conditions Job Aid (TD-1001M-JA10, Rev 4) and provided associated training on identification of potential clearance deviations.

We are assessing new technological processes and procedures to pilot that may support more accurate and reliable distance measurements between overhead objects, including conductor clearances.

[10] See TD-4621M, Excavation Safety Manual, Part 3, Section 1.4, p. 3-4 which lists the following as potential hazards: leaning pole or structure; heavy equipment on the pole or structure; loose soil; excavation depth relative to the buried depth of the pole or structure; excavating around the entire pole or structure; existing excavations; guy cables; topped poles; risers; utility (or other) poles; and ground rods connected to equipment such as cathodic protection rectifiers, transformers, capacitors, regulators, reclosers, etc.

Subsequent to the Edgewood Fire, we also initiated an effort to use LIDAR data to conduct engineering analysis for the identification of potential transmission conductor clearance issues within HFTD areas. LIDAR survey data have been combined with 3D asset models to calculate potential transmission conductor sag under maximum operating temperature. We reported our initial findings from this assessment to the CPUC in our Q1 2023 Self-Identified Potential Non-Compliance Report. We expect to complete assessments by March 31, 2024. Findings are prioritized and addressed via our notification process.

In 2023, we also revised the Transmission and Distribution Post-Construction Completion Standards Checklists to include an expanded section for the crew foreman or construction supervisor to check for GO 95 Rule 37 and Rule 38 clearance issues upon completion of overhead construction projects.[11] Quality Control post-construction audits have the same additional section to their checklists.

Violation 5 – GO 95, Rule 38

We agree with this violation. The minimum clearance between the Emerald Lake 4.2kV distribution circuit and the Jefferson-Stanford 60kV transmission circuit was not maintained at the Incident Location, and the maintenance tag to address this issue was not completed timely. Please see our response to Violation #1 regarding the timing of the identified notification tag #120899152 to address this issue. This tag was ultimately completed on 06/26/2022 following the Edgewood Fire.

Violation 6 – Public Utilities Code Section 451 and GO 95, Rule 37 and Rule 38

As an initial matter, we note that the maintenance tags listed in Violation 6 are not associated with the Edgewood Fire Incident Location.

As detailed below, we agree that EC tag #124536873 and LC tags #118014473, #118014477, and #118014490 were created to address insufficient conductor clearances per GO 95, Rule 37 and Rule 38, respectively. We did not correct these clearance issues within the original required end dates we assigned to these maintenance tags. The table below identifies when each of these maintenance tags were closed.

We respectfully disagree that the other identified maintenance tags are evidence of a violation of the General Orders or Public Utilities Code Section 451. The clearance issue identified in LC #124254305 was completed within the permissible maintenance tag correction timeline established by GO 95, Rule 18. Also, the clearance issues associated with LC tags #123431936, #123432042, and #123432044 are located in non-HFTD areas and require remediation by April 2025 under PG&E's current transmission maintenance tag timeline in alignment with GO 95, Rule 18. These maintenance tags are pending and will be completed pursuant to the procedures followed by our transmission maintenance program. They do not constitute a violation of the General Orders or Public Utilities Code Section 451.

[11] TD-2504P-01-F01

Type	Notification No	Description	Notification Create Date	Required End Date	Date Completed in Field	HFTD
LC	123431936	T0 MRTN-SNTH LE 19/132 GO95 CLRN INFRTN – E Tag	4/26/2022	4/26/2025	Pending	No
LC	123432042	T0 MRTN-SNTH LN 19/133 GO95 CLRN INFRTN – E Tag	4/26/2022	4/26/2025	Pending	No
LC	123432044	T0 MRTN-SNTH LN 19/134 GO95 CLRN INFRCT – E tag	4/26/2022	4/26/2025	Pending	No
EC	124536873	COND_CLER_ADJU - #13S\O LCO#3713 ALDERPO – E tag	9/20/2022	3/20/2023	11/28/2023	Tier 3
LC	124254305	T0 JEFFERSON-STANFORD 006/155 INS POLE – E tag, upgraded to B tag on 08/13/2022	8/9/2022	8/9/2023	10/22/2022 Completed Early	No
LC	118014473	T0 COOLEY LANDING-PALO ALTO 0/21 GO95 – E tag, upgraded to B tag on 8/15/2022	10/17/2019	10/17/2020	10/3/2022	No
LC	118014477	T0 COOLEY LANDING-PALO ALTO 0/23 GO95 – E tag, upgraded to B tag on 8/15/2022	10/17/2019	10/17/2020	10/3/2022	No
LC	118014490	T0 COOLEY LANDING-PALO ALTO 1/24 GO95 – E tag, upgraded to B tag on 8/15/2022	10/17/2019	10/17/2020	10/3/2022	No

Please do not hesitate to contact the undersigned at (925) 786-7144 or Vincent.Tanguay@pge.com should you have any questions or concerns regarding this response.

Sincerely,

Vincent Tanguay
Senior Director – Electric Compliance, Electric Engineering

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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