CALIFORNIA PUBLIC UTILITIES COMMISSION
Safety and Enforcement Division
Wildfire Safety and Enforcement Branch

Incident Investigation Report

Report Date: July 9, 2026

Incident Number: E20240430-02

Regulated Utility Involved: Pacific Gas & Electric Company (PG&E)

Date and Time of the Incident: May 20, 2022, at 1440 hours

Location of Incident: Intersection of Bill Owens Road and Highway 1, Point Arena, Mendicino County, California (38.873362, -123.657699)

Fatality/Injury: None reported.

Property Damage: Exceeding $50,000.

Regulated Utility Facilities Involved: Point Arena 1101 12kV Distribution Circuit

Summary

On May 20, 2022, the Owens Fire ignited in a Tier 2 High Fire Threat District (HFTD) located in Mendocino County, when a tree fell on a PG&E electric distribution line. The incident was reported to Safety Enforcement and Division (SED) on April 30, 2024, due to property damage exceeding $50,000. SED investigators reviewed documentation that included the California Department of Forestry and Fire Protection (CAL FIRE) report and PG&E internal documents. PG&E documents reviewed included the Post Fire Report, policy & procedures, open work orders and inspections on the facilities involved. The CAL FIRE report determined the cause of the fire to be vegetation contact with PG&E conductors. The PG&E Post Fire Report determined that the potential trees that struck the facilities were alive and healthy at the time of the incident. SED analyzed Electrical Corrective Notification number (EC Tag) #121690597 that determined a distribution pole needed to be replaced. The original due date for the work order was July 9, 2022. However, the work order was not completed during the timeline required under GO 95 Rule 18 due to delays PG&E incurred during its Field Safety Reassessment (FSR) program. As a result, SED found PG&E in violation of GO 95 Rule 18.

A. Rules and Requirements Violated

	Rule	Violation
1.	GO 95, Rule 18	PG&E failed to complete a work order, which identified a safety hazard, within the prescribed timeline.

GO 95, Rule 18.B.(1) – 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 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.*[1]

B. Witnesses

	Name	Title
1.	Jasdeep Lally	CPUC Lead Investigator
2.	Toby Linderman	CAL FIRE Lead Investigator

C. Evidence

	Source	Title
1.	CAL FIRE	CAL FIRE report, 05/29/2024
2.	PG&E	20-Day Incident Report, 05/29/2024
3.	CPUC	Data Request No. 1, 06/17/2024
4.	PG&E	Data Request No. 1 Response Part A, 07/24/2024
5.	PG&E	Data Request No. 1 Response Part B, 08/02/2024

6.	PG&E	Data Request No. 1 Q3 Supplemental Response, 01/17/2025
7.	PG&E	Data Request No. 1 Q14 Supplemental Response, 10/04/2024
8.	CPUC	Data Request No. 2, 09/30/2024
9.	PG&E	Data Request No. 2 Response, 10/11/2024
10.	CPUC	Data Request No. 3, 04/15/2025
11.	PG&E	Data Request No. 3 Response, 04/22/2025
12.	CPUC	Data Request No. 4, 07/29/2025
13.	PG&E	Data Request No. 4 Response, 08/05/2025

Background

The Owens Fire ignited in Mendocino County on May 20, 2022, when the Point Arena 1101 12kV Distribution Circuit was struck by a falling tree. The weather on the incident date was 55 degrees Fahrenheit (F) with wind gusts between 9 MPH to 18 MPH per the CAL FIRE report.[2] PG&E Meteorology reported the weather as 54.1 degrees F with wind speed between 19.8 MPH and 29.3 MPH.[3] CAL FIRE responded to the scene and contained the fire at approximately 36 acres. A CAL FIRE investigator noticed approximately six trees had fallen in the vicinity with heights ranging from approximately 30 to 80 feet in length. The tree that struck the PG&E conductor was approximately 30 to 50 feet long. The height of the tree could not be confirmed due to the trees being bucked[4] during fire suppression. The CAL FIRE investigator found more than one potential ignition area. Public Safety Power Shutoff (PSPS) and Enhanced Powerline Safety Settings (EPSS) were not active on the subject circuit the day of the incident. SED initiated an investigation into the incident on April 30, 2024, after PG&E reported the incident due to receiving a property damage claim exceeding $50,000. Figure 1 below shows a map of the incident location.

[2] CAL FIRE Report – Owens Fire, May 20, 2022, page 4.

[3] PG&E Preliminary Ignition Investigation Report, June 3, 2022, page 2.

[4] Bucking is when a felled and delimbed tree is cut into logs.

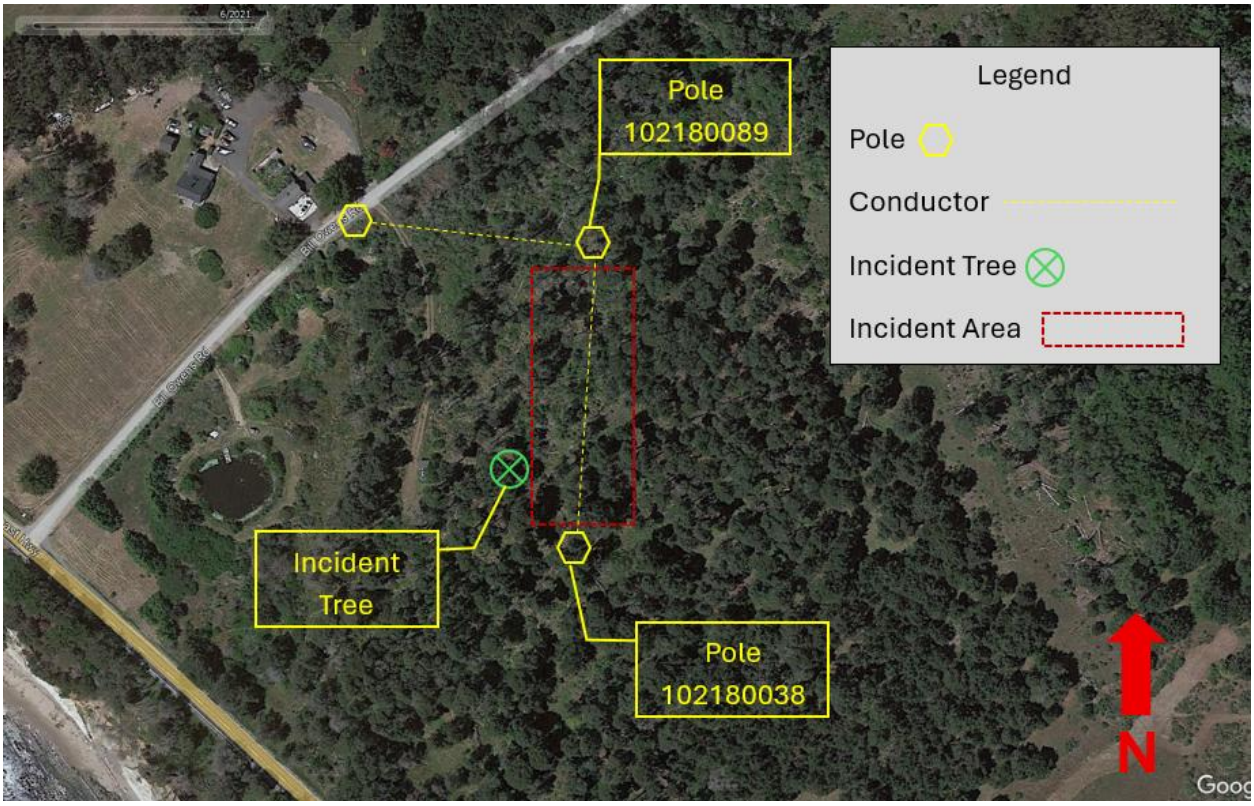


Figure 1: Incident Location of the Owens Fire.

Fire Authority Report

SED obtained the CAL FIRE investigation report on June 6, 2024. CAL FIRE determined the cause of the fire to be a tree, known as Tree 1, that fell on the PG&E Point Arena 1101 12kV Distribution Circuit. Tree 1 struck the conductor between power pole 1 (pole 102180089) and power pole 2 (pole 102180038) causing the conductor to contact the ground. Six total trees were found to have come down due to uprooting and were within an approximate 100 foot radius of one another. The height of the fallen trees ranged from 30 to 80 feet. CAL FIRE was unable to determine the height of Tree 1 due to trees being bucked during fire suppression. CAL FIRE identified two specific origin areas (SOA) due to conductor contacting vegetation and/or the ground. Figure 2 below shows a south facing view of the conductor span below Tree 1 in SOA 2.



Figure 2: Conductor underneath tree 1 looking south at power pole 2 (pole 102180038).[5]

CAL FIRE observed that the conductor between power pole 1 and power pole 2 was coated with a "tree wire" coating[6]. The coating is used to insulate some of the conductors so they will not arc if it contacts vegetation or other objects. The coating on the conductor had melted as shown in Figure 3.



Figure 3: Tree wire coated conductor with coating melted off.[7]

[5] Photograph from CAL FIRE report page 35.
[6] CAL FIRE Report – Owens Fire, May 20, 2022, page 4.
[7] Photograph from CAL FIRE report page 34.

SED Review and Analysis

Review of Event Timeline

SED reviewed the timeline of events reported by PG&E provided in the 20-Day Report.[8]

1. Incident Timeline on the Incident Date

The following events occurred on May 20, 2022:

- 1443 hours: First No Light (FNL) Line recloser 83354 open.
- 1443 hours: First Smart Meter Last Gasp Time.[9]
- 1449 hours: PG&E troubleman dispatched to the Point Arena 1101 circuit.
- 1511 hours: Integrated Reporting of Wildland Fire (IRWIN) time.
- 1517 hours: Troubleman reports wire down on load side of LR 83354, tree fell into line, small vegetation fire, CAL FIRE on scene.
- 1531 hours: Troubleman reports fire department still in process of extinguishing the fire.

2. Timeline of Events Following the Incident Date

The following events occurred on May 21, 2022:

- 0544 hours: PG&E repair crew dispatched to the Point Arena 1101 circuit.
- 1117 hours: Outage complete time in OMT. Line recloser 83354 closed via Supervisory Control and Data Acquisition (SCADA).[10]

PG&E's Vegetation Management (VM) teams conducted a post-fire investigation and found that incident involved three live Bishop Pine trees that had been uprooted due to wind and struck the primary conductor.[11] PG&E VM was unable to unable to determine the heights of the trees due to fire personnel bucking the trees during fire suppression.

PG&E reported the incident to the CPUC on April 30, 2024, due to property damage exceeding $50,000 after receiving a claim.

D. SED Document Review

1. PG&E PSPS Protocols and EPSS

The weather on May 20, 2022, at approximately 1500 hours was 55 degrees F with a wind speed of 9 MPH to 18 MPH per the CAL FIRE report. The weather station was located approximately 3.84 miles northwest of the incident location.

PG&E procedure PSPS-100P-01[12] was the effective document at the time of the incident to determine whether to activate a PSPS event. PG&E stated weather station data from stations in

[8] PG&E Preliminary Ignition Investigation Report, June 3, 2022, page 4.
[9] PG&E Data Request Response to DR-01 Question 17, PGE-CPUC-OWENS_00000116, July 24, 2024.
[10] PG&E Outage Report, May 21, 2022, page 1.
[11] PG&E Vegetation Management Incident Report Form, May 20, 2022, page 2.
[12] PG&E Data Request Response to DR-01 Question 24, PGE-CPUC-00000161, July 24, 2024.

the vicinity did not meet Minimum Fire Potential Conditions. PG&E Meteorology identifies the potential to meet the R5-Plus conditions for their Fire Potential Index (FPI) and determined the FPI on the incident date was R1[13]. The subject circuit was not subject to a PSPS event on the incident date. The Point Arena 1101 circuit did not have EPSS capabilities installed at the time of the ignition[14].

2. PG&E GO165 Inspections

SED reviewed PG&E patrols and inspections for five years prior to the incident date. Table 1 in GO 165 (2012) and GO 165 (2017) provides the cycles in intervals of years for rural distribution inspections. The incident was located inside a HFTD 2[15]. No issues were identified and Table 1 below shows the dates that PG&E conducted the GO 165 patrol and the expected due date for the next inspection.

Table 1: Distribution Patrols and Detailed Inspections conducted on Point Arena 1101 12kV Distribution Circuit.

Type of GO165 Patrol/Inspection	Date Inspection Performed	GO165 Next Patrol/Inspection Due Date
Patrol	June 7th, 2013	October 31st, 2015
Patrol	June 13th, 2015	October 31st, 2017
Detailed	May 9th, 2017	September 30th, 2022
Patrol	August 6th, 2018	December 31st, 2019
Patrol	September 24th, 2019	January 31st, 2021
Patrol	August 24th, 2020	December 31st, 2021
Detailed	July 9th, 2021	November 30th, 2026

3. PG&E Vegetation Management (VM) Inspections

PG&E conducts Annual Routine and Bi-Annual Second Patrols as part of their vegetation management inspections[16]. These inspections include all primary and secondary overhead electric distribution conductors and facilities, excluding service drops. SED reviewed PG&E procedure TD-7102P-01 "Distribution Routine Patrol Procedure (DRPP)"[17]. TD-7102P-01 directs areas to be inspected for all vegetation with potential to grow, sway, or fall into PG&E's electric distribution and distribution underbuild conductors.

SED analyzed PG&E procedure TD-7106P-01 "Enhanced Vegetation Management Pre-Inspection Procedure"[18]. Procedure TD-7106P-01 section 4 relates to "Trees with Strike Potential". The section states that all trees tall enough to strike facilities must be inspected and a

[13] PG&E Data Request Response to DR-03 Question 4, April 22, 2025.
[14] PG&E Preliminary Ignition Investigation Report, June 3, 2022, page 3.
[15] PG&E 20-Day Report, May 29, 2024, Page 2.
[16] PG&E Data Request Response to DR-01 Question 14, July 24, 2024.
[17] PG&E Data Request Response to DR-02 Question 1, PGE-CPUC-OWENS_00000286, October 11, 2024.
[18] PG&E Data Request Response to DR-02 Question 1, PGE-CPUC-OWENS_00000369, October 11, 2024.

vegetation point must be created.[19] The inspector must then assess the tree using the tree assessment tool (TAT) within GISArc Collector. If the result is "abate" then tree work is prescribed to remove the risk. If "do not abate" is the result no work is required.

PG&E did not identify the cluster of incident trees in the inspections conducted prior to the incident date.

4. Vegetation Management (VM) Analysis

SED reviewed and analyzed the PG&E Vegetation Management Incident Report Form. The report identified the cluster of fallen trees as Bishop Pines. The report concluded there was no decay in the subject trees, and they were healthy and alive at the time of the incident[20]. PG&E determined the trees failed at the base of the root due to shallow root structures. The bases of the subject trees were located approximately 25-30 feet from the conductor[21]. The arborist was unable to determine the height of the trees due to the trees being bucked and scattered during CAL FIRE suppression efforts. The diameter at breast height (DBH) for the subject trees was determined to be 25", 24", and 22". PG&E noted that the soil condition around the subject trees was wet with poor drainage, saturated soils, and puddles in the vicinity[22]. Figure 4 below shows the Bishop pines tree roots with a puddle.

[19] PG&E Data Request Response to DR-02 Question 1, PGE-CPUC-OWENS_00000369, October 11, 2024.
[20] PG&E Vegetation Management Incident Report Form, May 29, 2024, Page 2.
[21] PG&E Vegetation Management Incident Report Form, May 29, 2024, Page 1.
[22] PG&E Preliminary Ignition Investigation Report, June 3, 2022, page 2.



Figure 4: Tree roots of incident trees showing puddle and uplift.[23]

5. Analysis of overdue Electrical Corrective (EC) Tag # 121690597

GO 95, Rule 18 requires that each regulated utility establish maintenance programs for its facilities and sets maximum time periods to complete corrective actions associated with potential violations of GO 95 or Safety Hazards. Priority Levels 1-3 are defined in Table 2.

Table 2: General Order Rule 18 priorities and repair timelines.

[23] PG&E Vegetation Management Incident Report Form, May 29, 2024, Page 6.

Priority Level 1	An immediate risk requiring immediate corrective action.
Priority Level 2	A risk of moderate potential impact and requiring corrective action within 6 months in a Tier 3 HFTD, within 12 months in a Tier 2 HFTD if it creates a fire risk, and 36 months for all others.
Priority Level 3	Any risk of low potential impact generally requiring corrective action within 60 months.

While the CPUC tracks work using the prioritization levels set by GO 95, PG&E uses its own internal prioritization levels when repair or corrective work is needed. The work is prescribed by a corrective work form with an identifying "tag." Distribution work orders receive an EC Tag. These tags have priority levels which correspond to different types of work and different required due dates.

SED reviewed work orders in the Incident Area and performed its analysis based on the PG&E prioritization procedures that were in effect at the time of the work order's creation. According to PG&E Electric Distribution Preventive Maintenance (EDPM) Manual[24], effective April 2016, Priority tags A, B, E, and F were defined in Table 3.

Table 3. PG&E repair priority timelines.

Priority A Tags	Emergency tags requiring an immediate response or stand-by.
Priority B Tags	Urgent compliance due within 3 months.
Priority E Tags	Compliance tag due within 3-12 months.
Priority F Tags	Compliance tag due date by next inspection (UG = 3 years, OH = 5 years)

SED reviewed EC Tag #121690597[25] that identified a pole as rotten and decayed on July 9, 2021, and called for a replacement. The pole is located within a Tier 2 HFTD and the repair was given Priority E with a required completion date of July 9, 2022. The EC Tag was subject to the Field Safety Reassessment (FSR) on August 16, 2022, which acknowledged the condition still needed to be addressed and was given a new suggested due date of August 17, 2023. A second FSR was conducted on September 29, 2023, which acknowledged the condition still needed to be addressed with a new suggested due date of September 30, 2024. This maintenance tag was not directly related to the ignition.

Rule 18 requires that when a utility identifies Level 2 priority work that poses a fire risk in a Tier 2 HFTD, the corrective work must be completed within 12 months. However, PG&E did not complete the work identified in EC Tag #121690597 in the allotted timeframe. The pole and its

[24] PG&E Data Request Response to DR-04 Question 1, PGE-CPUC-OWENS_00000704, August 5, 2025.
[25] PG&E Data Request Response to DR-01 Question 13, PGE-CPUC-OWENS_00000109, July 24, 2024.

associated equipment were replaced on June 4, 2025, 1060 days after the original due date[26]. PG&E confirmed that it did not submit a Rule 18 exemption request for EC Tag #121690597[27].

Conclusion

Based on the evidence reviewed and examined in this investigation, SED's investigation finds that PG&E violated GO 95 Rule 18. PG&E failed to complete EC Tag #121690597, replacement of a decayed pole, as prescribed by Rule 18. The tag was completed on June 4, 2025, 1131 days after the original due date of July 9, 2022. The open maintenance work was not directly involved with the ignition of the incident. The incident trees were alive at the time of the incident and were not noted in any inspections for issues related to uprooting or for potential strike risk. Since the trees were bucked during the fire suppression process VM teams were unable to determine the height of the incident trees.

If SED becomes aware of additional information that could modify SED's findings in this report, SED may re-open the investigation. If so, SED may modify this report and take further actions as appropriate.

[26] PG&E Data Request Response to DR-04 Question 2, PGE-CPUC-OWENS_00000696, August 5, 2025.
[27] PG&E Data Request Response to DR-04 Question 2, August 5, 2025.