



Public Utilities Commission

STATE OF CALIFORNIA

Citation Date: August 29, 2023
Citation #: D.16-09-055 W.23-08.001
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
MEAe@pge.com

CITATION

Pacific Gas and Electric Company (PG&E or Utility) is cited for eight violations, resulting in a financial penalty of **\$1,074,000**. On August 25, 2021, the Safety and Enforcement Division (SED) began its investigation into the Mule Fire under Incident Number E20210825-01. Through its investigation, SED identified that PG&E violated General Order (GO) 95, Rule 18 for failing to complete work orders by the required due date in two separate instances; GO 95 Rule 19 for failing to preserve and provide evidence to SED during its investigation; and GO 95 Rule 31.1 for failing to use accepted good practices, including the Utility's internal procedures, for the design, construction, and maintenance of its electrical facilities in five separate instances.

VIOLATIONS

SED's investigation found PG&E in violation of GO 95 in eight separate instances:

- 1) PG&E failed to preserve evidence as required by GO 95 Rule 19 (Jan. 2020, p. I-12);
- 2) PG&E failed to complete five work orders within the timeline prescribed by GO 95 Rule 18 (Jan. 2020 p. I-9);
- 3) PG&E failed to complete Field Safety Reassessments (FSRs) prior to the work order's due date as required by PG&E's internal procedures, and therefore failed to maintain its electrical facilities in accordance with accepted good practices as required by GO 95 Rule 31.1 (Jan. 2020, p. III-5);
- 4) PG&E failed to assign a work order the correct due date as prescribed by GO 95 Rule 18 (Jan. 2020 p. I-9);
- 5) PG&E failed to use accepted good practices when performing maintenance on PG&E's electrical facilities which directly lead to the ignition of the Mule Fire, a violation of GO 95 Rule 31.1 (Jan. 2020, p. III-5);
- 6) PG&E failed to maintain its internal procedures in accordance with the requirements of Public Resources Code (PRC) section 4427 and therefore failed to meet the requirements for using accepted good practices as required by GO 95 Rule 31.1 (Jan. 2020, p. III-5);



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- 7) PG&E failed to comply with its internal procedures, which required water storage and 200 feet of hose as fire suppression equipment present at the jobsite during the work performed at the ignition site of the Mule Fire, and therefore failed to use accepted good practices as required by GO 95 Rule 31.1 (Jan. 2020, p. III-5);
- 8) PG&E failed to comply with its internal training procedures by having workers on the job site performing work during the ignition of the Mule Fire with inadequate training and therefore failed to use accepted good practices as required by GO 95 Rule 31.1 (Jan. 2020, p. III-5);

General Order 95, Rule 18.B.1.a.ii – Maintenance Programs states in part:

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

(a) The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels...

(ii) 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; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.

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

Each utility shall provide full cooperation to Commission staff in an investigation into any major accident (as defined in Rule 17) or any reportable incident (as defined in CPUC Resolution E-4184), regardless of pending litigation or other investigations, including those which may be related to a Commission staff investigation. Once the scene of the incident has been made safe and service has been restored, each utility shall provide Commission staff upon request immediate access to:

- Any factual or physical evidence under the utility or utility agent's physical control, custody, or possession related to the incident;

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

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

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.



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ENCLOSURES

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

Enclosure 1 – SED’s Incident Investigation Report, dated March 23, 2023

Enclosure 2 – SED’s Notice of Violation (NOV), dated May 23, 2023

Enclosure 3 – PG&E’s Response to SED’s NOV, dated June 23, 2023

STATEMENT OF FACTS

The above violations are documented in the attached *Enclosure 1 – SED Incident Investigation Report* which is based on the following: SED’s field observations, SED’s interviews with witnesses of PG&E personnel, SED’s review of PG&E’s records and responses to SED’s data requests, the CAL FIRE investigation report, and SED’s review of PG&E’s NOV response dated June 23, 2023.

BACKGROUND

The Mule Fire ignited on August 21, 2021, at approximately 1400 hours near the transformer fed by the 12 kV Girvan 1101 circuit (Subject Circuit), serving 7273 Placer Road, Redding, California. The fire burned approximately 10 acres, one stand-alone garage and fencing. The Incident Location is in a Tier 3 High Fire Threat District (HFTD).

The Mule Fire started during installation of a new service drop. While a PG&E journeyman lineman was cutting the second hot conductor of the service drop, the bolt bite style cutters contacted the hot conductor and the neutral conductor at the same time. The contact generated sparks which landed approximately 15 feet from the pole, causing a fire. The PG&E contracted work crew was unable to control the fire. The California Department of Forestry and Fire Protection (CAL FIRE) responded and contained the fire on the same day.

PG&E reported the incident to the CPUC SED on August 25, 2021, under the property damage criterion due to damages anticipated to exceed \$50,000. SED’s investigation of the incident revealed that PG&E violated several requirements in General Order (GO) 95 Rules for Overhead Electric Line Construction. PG&E violated GO 95 Rule 18 in two instances by failing to complete multiple work orders on time and failing to assign the correct due date for a work order. PG&E violated GO 95 Rule 19 in one instance by failing to preserve evidence from the incident. PG&E violated GO 95 Rule 31.1 in five instances by failing to comply with the Utility’s internal standards and accepted good practices: (1) PG&E failed to complete FSRs of work orders by the due date of the work order, (2) PG&E failed to use safe work practices while operating the cutting tool on the job site for the work performed during the ignition of the Mule Fire, (3) PG&E failed to maintain its standards in accordance with Public Resources Code section 4427, (4) PG&E failed to have the required fire suppression equipment on the job site for the work performed during the ignition of the Mule Fire, and (5) PG&E failed to ensure all workers had adequate training on the job site for the work performed during the ignition of the Mule Fire.



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SED CITATION ANALYSIS

Element	Staff Finding
Number of violation(s) and duration of violation(s)	Violation 1, GO 95 Rule 19, for one day. Violation 2, GO 95 Rule 18, for seven-hundred-seventy days. Violation 3, GO 95 Rule 31.1, for six-hundred-forty-one days. Violation 4, GO 95 Rule 18, for one day. Violation 5, GO 95 Rule 31.1, for one day. Violation 6, GO 95 Rule 31.1, for one-hundred-ninety-eight days. Violation 7, GO 95 Rule 31.1, for one day. Violation 8, GO 95 Rule 31.1, for one day.
Severity or gravity of the offense	<p>Economic Harm: 10 acres of Tier 3 HFTD wildlands were burned in addition to one stand-alone garage and fencing. \$49,780 in non-utility property damages claimed as of September 23, 2021. The incident caused six customers to experience a power outage and the repairs after the fire de-energized an additional 379 customers.</p> <p>Physical Harm: None.</p> <p>Regulatory Harm/Number of Violations: SED identified eight total violations of General Order 95.</p>



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Element	Staff Finding
<p>Conduct of the utility</p>	<p>Violation 1 SED attempted to view the transformer’s fuses during the site visit to PG&E’s Evidence Warehouse where PG&E stored the evidence collected. PG&E failed to retain the transformer’s fuses. The fuses were the primary protective device that protected the system when the journeyman lineman made contact between the hot conductor and the neutral.</p> <p>PG&E collected evidence connected to both ends of the fuses but failed to preserve the fuses. As a result, SED was unable to conduct a proper inspection of the transformer fuses. Per GO 95, Rule 19, PG&E is required to and should have preserved the fuses to assist in SED’s investigation. SED finds that PG&E’s failure to preserve the fuses is a violation of GO 95, Rule 19, which requires that a utility grant Commission staff access to any factual or physical evidence under the utility or utility agent’s physical control, custody, or possession related to the incident.</p> <p>Violation 2 Electric Overhead Tags 116805838, 118960151, 118961974, 119117143, and 120786027 were Level 2 tags. GO 95 Rule 18.B.1.a.ii states that Level 2 priority corrective actions must be completed within six months for potential violations that create a fire risk in Tier 3 HFTDs. SED finds that PG&E’s failure to perform corrective action on these five work orders within six months is a violation of GO 95, Rule 18.B.1.a.ii.</p> <p>Violation 3 PG&E’s internal standards and bulletins and GO 95 set deadlines for corrective action to reduce risks to the system. The deadlines for corrective actions in GO 95, Rule 18 are not permitted to be extended except under reasonable circumstances. As part of this investigation, SED identified four tags which were re-assessed after their initial corrective action deadline: Electric Overhead Tags 119117143, 118961974, 116805838, and 118960151. After PG&E performed the safety re-assessments, PG&E assigned a deadline of one year for corrective action, which is longer than the initial deadline for corrective action of six months mandated by GO 95, Rule 18. The safety re-assessment process disregards the mandated risk-reduction by both GO 95 and PG&E Procedure TD-8123S. The process permits PG&E to continue to re-assess each year, which ignores the risk reduction specified in GO 95, Rule 18 and is therefore not accepted good practice. SED finds that PG&E’s failure to maintain its equipment in accordance with accepted good practice is a violation of GO 95, Rule 31.1.</p>



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Element	Staff Finding
Conduct of the utility (continued)	<p>Violation 4 PG&E incorrectly assigned a corrective action due date of 12 months after identification for Electric Overhead Tag 119117143 instead of six months as required by PG&E Procedure TD-8123S and GO 95, Rule 18.B.1.a.ii. SED finds that PG&E failed to correctly assign the corrective action due date, a violation of GO 95, Rule 18 B.1.a.ii.</p> <p>Violation 5 The Apparent Cause Evaluation (ACE) report states that the PG&E lineman held the cutter with his right hand and rested the other handle on his shoulder, while holding the energized conductor in his left hand. This position did not allow the journeyman lineman to maintain control of the cutter, which resulted in the cutter slipping and contacting the neutral line. This action ignited the Mule Fire. This action violates PG&E Procedure TD-1464S, Section 2.7.3. Additionally, the journeyman lineman was unable to properly control the cutter to prevent it from contacting the neutral and the energized conductor at the same time. This is a violation of Section 2 of the California Safety Manual Code of Safe Work Practices Accident Prevention Rules (Red Book), which states contact must be avoided. While it was accidental, the journeyman lineman failed to recognize the danger and take appropriate precautions to avoid contact between the neutral, energized wire and the cutter. As a result, SED finds PG&E did not follow its internal procedures and accepted good practice. This is a violation of GO 95, Rule 31.1.</p> <p>Violation 6 SED finds the requirements in PG&E Procedure TD-1464S Revision 5 did not meet the minimum requirements of PRC section 4427. When any person performs the activities set forth in Section 4427, the minimum requirements in Section 4427 require that a person first perform the required mitigation measures of clearing all flammable material within 10 feet. PG&E Procedure TD-1464S Section 2.7.4 only requires clearing of the ground when performing ground level jobs. PG&E Procedure TD-1464S does not require clearing of the ground activities (such as operating a grinding device) were performed at the top of a pole. PG&E confirmed this difference in their utility standard requirements, stating the following, “<i>When TD-1464S was developed, Section 2.7.4 was established to meet the requirements defined within PRC-4427, “performing ground level jobs or activities that would produce a spark, fire, or flame.” Regardless of the height of a pole, Section 2.7.4 was not considered to be effective for pole top operations.</i>” This requirement is in direct contradiction with Section 4427, which contains no exceptions for the location of the work being performed. SED finds PG&E failed to create a procedure that met the minimum requirements of PRC 4427, which constitutes a violation of GO 95, Rule 31.1.</p>



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Element	Staff Finding
Conduct of the utility (continued)	<p>Violation 7 PG&E Procedure TD-1464S Revision 5, Section 5.2.1 required that there be at least 120 gallons of water at the jobsite with at least 200 feet of hose with 40 psi at the nozzle in R4 conditions. At the site of the Mule Fire, the contractor parked the water buffalo on the street approximately 292 feet away from where work was being performed. Access to the jobsite was limited due to a variety of obstructions including a narrow access path, sloped ground, trees, fences and other debris. Consequently, the water buffalo could not have been used to fight any potential ignitions resulting from the work from where it was parked, due to both the hose not being long enough and the obstructions. As a result, the workers needed to move the water buffalo to fight the fire. SED finds that the water buffalo was not properly placed at the jobsite in violation of PG&E’s own procedures. PG&E’s ACE report confirms SED’s conclusion that the water buffalo was not positioned correctly. SED finds that PG&E failed to follow its own procedures which constitutes a failure to follow accepted good practice while performing work, a violation of GO 95, Rule 31.1.</p> <p>Violation 8 PG&E Procedure TD-1464S requires SAFE-1503BWT training for all employees and contractors working on “any forest, brush or grass-covered lands.” PG&E failed to train one contractor that performed work at the jobsite. PG&E admits in their ACE report, “SAFE-1503WBT training is not consistently profiled to employees and contractors that are impacted by the rules.” PG&E failed to follow its own procedures to adequately train its contractors so that they can act in accepted good practice for known local conditions. As a result, SED finds that PG&E violated GO 95 Rule 31.1.</p>



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Element	Staff Finding
<p>Prior history of similar violation(s)</p>	<p>SED’s incident investigations have found PG&E in violation of similar policies and laws at least three times since 2017. Examples include:</p> <ul style="list-style-type: none"> • 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 an HFTD by the required timeline and found PG&E in violation of GO 95 Rule 31.1 by failing to comply with its internal procedures for addressing work orders in a timely manner. • E20181108-01: On November 8, 2018 in Pulga, CA, a ground fault on PG&E Transmission Tower :27/221 ignited the Camp Fire. The fire burned approximately 153,336 acres, destroying 18,804 structures, and resulting in 85 fatalities. SED found PG&E in violation of GO 95 Rule 18 for assigning an incorrect priority for a work order for a disconnected insulator hold-down anchor on Tower :27/221. • E20271011-02: On October 8, 2017, a PG&E pole that was part of the Redbud 1102 circuit failed and fell to the ground which resulted in arcing of the conductors and started the Sulphur Fire. The Sulphur Fire burned approximately 2207 acres, 134 residential structures, two commercial structures, and 26 buildings. SED found PG&E in violation of GO 95, Rule 19 for failing to preserve a burnt pole as evidence related to a reportable incident and Commission investigation. PG&E stated in a data request response that the pole may have been physical evidence related to the Sulphur Fire and that a contractor put the pole into waste collection bins.
<p>Self-reporting of the violation</p>	<p>PG&E self-reported the Mule Fire incident under the property damage criterion set forth in Decision (D.) 06-04-055 (Apr. 28, 2006) and Resolution E-4184 (Aug.21, 2008). After PG&E self-reported this incident, SED followed up with an incident investigation.</p>
<p>Financial resources of the utility</p>	<p>PG&E provides natural gas and electric services to approximately 16 million people. PG&E’s annual revenue in 2022 was \$21.68 billion.</p>



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Element	Staff Finding
<p>The totality of the circumstances</p>	<p>Aggravating factors include:</p> <ul style="list-style-type: none"> • Multiple prior violations were found during investigations of previous fires for work orders not being completed on time. • The incident occurred in a Tier 3 HFTD. • PG&E identified that the actions taken by the lineman directly caused the Mule Fire. <p>Mitigation 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 both of the Rule 18 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 the property damage criterion set forth in D.06-04-055 (Apr. 28, 2006).
<p>The role of precedent</p>	<p>PG&E has been cited for violations of GO 95 Rule 18 for the failure to complete work orders on time, Rule 19 for the failure to preserve evidence, and Rule 31.1 for the failure to follow the Utility’s’ internal procedures in the past.</p> <p>Violation 1, regarding the preservation of evidence; Violation 5, regarding the unsafe actions while working on the PG&E pole that ignited the Mule Fire; and Violation 8, regarding the inadequate training of one of the workers at the job site the day of the Mule Fire were all assessed with the maximum per day fine (\$100,000), due to the severity of the offenses.</p> <p>Violations 2 and 4 regarding the failure to complete work orders on time were assessed with the minimum per day fine (\$500) due to PG&E acknowledging these violations and not being directly associated with the cause of the fire.</p> <p>Violations 3, 6, and 7 regarding PG&E’s internal procedures on FSRs, pole clearing, and availability of fire suppression equipment, respectfully, were assessed with the minimum per day fine (\$500) due to the violations being of a procedural nature.</p>
<p>Resultant Citation Taking All of These Factors Into Account</p>	<p>The penalty is \$1,074,000 consistent with the administrative limit on citations adopted in Decision 16-09-055, Phase Two Decision (Sept. 30, 2016).</p>



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RESPONSE:

Respondent is called upon to provide a response to this Citation by: **5:00 PM on September 29, 2023**. 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 Pub. Util. Code §2107 and Decision 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 (September 8, 2023) after service of the citation is affected, 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.

/s/

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: <Insert Title>

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 156 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.



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Enclosures to Accompany Utility Appeal

Utility to add list of Enclosures as appropriate: