

June 12, 2026

Patrick Doherty
Program Manager | Performance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Energy Safety NODI ID: PAD_PGE_RMA_20260223_1436
Notice of Data Inaccuracy: Government Code §§ 15475.1(a) and 15475.2(a)(2), and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2)

Dear Mr. Doherty:

This letter is in response to the above referenced Notice of Data Inaccuracy (NODI) dated May 19, 2026, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2025 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Second Quarter (Q2) Quarterly Data Report (QDR).

Energy Safety based its compliance assessment on the following statute and code sections:

California Government Code Section 15475.1, states:

- (a) *The office may determine that a regulated entity is not in compliance with any matter under the authority of the office. If necessary, the office may undertake an investigation into whether the regulated entity is noncompliant with its duties and responsibilities or has otherwise committed violations of any laws, regulations, or guidelines within the authority of the office.*
- (b) *The office's primary objective is to ensure that regulated entities are reducing wildfire risk and complying with energy infrastructure safety measures as required by law.*

California Government Code Section 15475.2, states:

- (a) *The office may issue a notice of defect or violation to direct the regulated entity to correct any defect or noncompliance with the approved wildfire mitigation plan or failure to comply with any laws, regulations, or guidelines within the authority of the office.*

California Code of Regulations, Title 14, Section 29302(b)(2), "Investigations, Notices of Defect and Violation, and Referral to the Commission" states in part:

"The Director may designate a compliance officer to consider the findings of any investigation. The compliance officer may issue any of the following:

...

(2) Notice of violation, identifying noncompliance with an approved Wildfire Mitigation Plan or any law, regulation, or guideline within the authority of the Office.”

The NODI was identified from a February 23, 2026 inspection by Energy Safety in the vicinity of the city of Lower Lake, CA, a High Fire Threat District (HFTD) Tier 2 of PG&E’s Q2 QDR report for WMP Initiative 8.1.2.5.1 – Traditional Overhead Hardening (Transmission Conductor), Utility Initiative GH-06:

Data Inaccuracy 1. Energy Safety observed that on Pole ID 004/002, Grid Hardening ID 74063735-19 at coordinates 38.8986780004399, -122.55821199956, no Traditional Overhead Hardening – Transmission Conductor (Shunt Splices) were installed at the reported location.

Response

PG&E acknowledges Energy Safety’s February 23, 2026, observation of no installed shunt splice on Pole ID 004/002, Grid Hardening ID 74063735-19 at coordinates 38.8986780004399, -122.55821199956.

Since Energy Safety’s February 23, 2026, inspection, PG&E has provided corrected Traditional Overhead Hardening -Transmission Conductor (GH-06) completion data in the Quarterly Data Report (QDR) submitted on May 1, 2026. The provided updates were committed process improvements developed in response to a previously received Energy Safety Notice of Nonperformance (NON) “NON_CAD_PGE_CYA_20250827_1038”, received on December 22, 2025. In the “NON_CAD_PGE_CYA_20250827_1038” response, PG&E committed to the following:

“To align PG&E’s system of record with the data provided to Energy Safety, PG&E will be issuing a revision to its 2024 Q4 dataset, removing records as necessary, after a thorough review. Additionally, PG&E will be reviewing its GH-06 program data for 2024 (Q1 through Q3) and 2023 (all quarters) to ensure accuracy and will submit revisions for any other prior submission that have been affected by the identified root cause.”

PG&E performed an analysis of the Traditional Overhead Hardening -Transmission Conductor (GH-06) completion data for accuracy and provided a final update in the May 1, 2026, QDR submission. We understand that PG&E’s May 1, 2026, QDR submission may not have been reviewed before Energy Safety’s May 19, 2026, submission of this NODI.

The subject pole was removed from the revised data set that was provided to Energy Safety and now reflects accurate records.

Please do not hesitate to contact WSComplianceMailbox@pge.com if you have any questions regarding this matter.

Sincerely,

Daniel Kushner, PhD
Senior Director, Electric Risk & Compliance

cc: Samuel Isaiah, Senior Utilities Engineer Specialist, Energy Safety
Yana Loginova, Program Manager, Energy Safety
Shannon Greene, Program & Project Supervisor, Energy Safety
Romeo Marroquin Ajcac, Field Inspector, Energy Safety