

April 10, 2026

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

RE: Energy Safety NON ID: NON_PAD_PGE_BKA_20251105_1405
Notice of Nonperformance: 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 Nonperformance (NON) dated March 11, 2026, regarding the Office of Energy Infrastructure Safety (Energy Safety)'s inspection of work completed by Pacific Gas and Electric Company (PG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP).

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.”

On November 5, 2025, Energy Safety conducted an inspection of Pacific Gas and Electric Company’s WMP initiatives in the vicinity of the city of Auburn, California. . . . Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.1.2.10.5 - Non-Exempt Expulsion Fuses, PG&E failed to complete the installation of non-exempt expulsion fuses on Pole ID 228375, Grid Hardening ID 31700012 at coordinates 38.8936432596489, -121.061130400367. Energy Safety considers this non-performance to be in the Minor risk category. PG&E must complete a corrective action for this deficiency by 12 months of this notice.

Response

While PG&E agrees with the state of the facilities and surrounding vegetation, as further explained below, we respectfully disagree that this constitutes a deficiency.

Finding 1 - Exempt fuses were not installed at the subject pole.

PG&E agrees that exempt fuses are not installed on the subject pole. As described in the language of initiative 8.1.2.10.5 identified by Energy Safety: Non-exempt fuses may be replaced and/or removed as part of PG&E's Non-Exempt Expulsion Fuse program. In this instance, PG&E removed the non-exempt fuses from the subject pole, thus meeting the requirements of WMP initiative 8.1.2.10.5.

Finding 2 - The inspector observed Solid Blade disconnects on the subject pole.

PG&E agrees there are solid blade disconnects installed on this structure. The deployment of solid blade disconnects at this location is consistent with initiative 8.1.2.10.5.

Finding 3 - The inspector did not observe a 10 foot firebreak clearance around the subject pole.

PG&E agrees that there is not a 10-foot firebreak clearance around the subject pole. Pole 228375 is not located in a State Responsibility Area (SRA) or US Forest Service (USFS) Federal Responsibility Area (FRA) and therefore is not subject to PRC 4292 requirements.

In the process of responding to this finding, we evaluated the language of initiative 8.1.2.10.5 identified by Energy Safety, to determine where the confusion regarding this pole may lie. We would appreciate the opportunity to discuss VM practices within the context of our GH-10 initiative and their alignment with regulations such as PRC 4292.

We have evaluated and will continue to evaluate vegetation along this span as part of our routine and hazard vegetation management programs and have not currently identified the tree

in the photo as a threat to the facilities or as breaching clearance requirements. Accordingly, the tree has not been targeted for pruning or removal.

Finding 4 - No reclosers, sectionalizers, or voltage regulators were observed at the subject pole.

PG&E agrees that there are no reclosers, sectionalizers or voltage regulators installed on the subject pole. As described in the language of initiative 8.1.2.10.5 identified by Energy Safety: Non-exempt fuses may be replaced and/or removed as part of PG&E's Non-Exempt Expulsion Fuse program. In this instance, PG&E removed the non-exempt fuses from the subject pole, thus meeting the requirements of WMP initiative 8.1.2.10.5.

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
Babak Kaviani, Field Inspector, Energy Safety