



April 16, 2026

Daniel Kushner

DDKO@pge.com

Senior Director- Electric Risk and Compliance

Pacific Gas and Electric Company

300 Lakeside Drive Suite 210,

Oakland, CA 94612

NOTICE OF NON-PERFORMANCE

Mr. Daniel Kushner:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) conducted inspections of work completed by Pacific Gas and Electric Company (PG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP). During the inspections, Energy Safety determined the existence of non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON).

On April 8, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Sutter Creek, California within High Fire Threat District (HFTD) Tier 2 and the State Responsibility Area (SRA). The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that PG&E failed to implement its 2025 WMP initiative 8.2.3.4, which requires compliance with Public Resources Code section 4293, by not removing a dead, declining or dying tree near coordinates 38.44392947856192, -120.76739774096828. Energy Safety considers this non-performance to be in the Moderate risk category. PG&E must complete a corrective action for this non-performance by six months from the date of this notice.¹

Within 30 days from the issuance date of this NON, PG&E must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket² and the associated file name(s) must begin with the NON identification number.

Prior to its response, PG&E may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than 10 business days before the response deadline.³ Requests

¹ Gov. Code section 15475.2(a)(2)

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

³ Energy Safety Performance Guidelines, p. 4

for informal conference with Energy Safety must be e-mailed to environmentalscience@energysafety.ca.gov, with a copy sent to me and Akiko Masuda, Akiko.Masuda@energysafety.ca.gov.

Sincerely,

Elizabeth McAlpine

Elizabeth McAlpine
Supervisory Environmental Scientist | Environmental Science Division
Office of Energy Infrastructure Safety
Elizabeth.McAlpine@energysafety.ca.gov

Cc:

Mandy Knockaert

mandy.knockaert@pge.com

Rahima Manderola

Rahima.Manderola@pge.com

Savannah Torres

Savannah.Torres@pge.com

electricdatarequests@pge.com

WSComplianceMailbox@pge.com



INSPECTION REPORT

Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts field inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk. A Notice of Non-Performance (NON) is issued for any instances of non-performance identified during an inspection of its WMP initiatives.

Energy Safety has designated this finding of a deficiency as a “Moderate” risk. PG&E must correct the deficiency pursuant to the timeline provided in Table 1.⁴

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency correction timeline
Severe	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 2 months (in High Fire Threat District (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	<ul style="list-style-type: none">• 12 months

⁴ Energy Safety Performance Guidelines, p. 4



Inspection Summary

Energy Safety found a “Moderate” deficiency near coordinates 38.44392947856192, -120.76739774096828 in HFTD Tier 2. PG&E failed to remove the danger tree.⁵

The inspection location and WMP initiative summary are included in Table 2.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	PG&E
Report Number:	NON_ESD_PGE_KJO_20260408_1006
Inspector:	Kelsea Jones
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4) 2025
Inspection Selection:	Energy Safety inspected the locations based on PG&E’s QDR.
Relevant WMP Initiative(s):	8.2.3.4 Fall-In Mitigation
Date of inspection:	April 8, 2026
City and/or County of Inspection:	Sutter Creek, California

⁵ PG&E “2023-2025 Base WMP”, published February 13, 2025. p. 691
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true> accessed April 9, 2026).

Inspection Findings

Deficiency 1

Relevant Requirement:

PG&E's WMP initiative 8.2.3.4 Fall-In Mitigation states: "PG&E's Regulatory Compliance work starts with an annual patrol of all PG&E distribution lines to support compliance with the [California Public Utilities Commission] CPUC's [General Order] GO 95 Rule 35, and California [Public Resources Code] PRC Section 4293. Every year, we inspect trees along our entire distribution system— approximately 80,000 miles of overhead distribution lines....The objective of the Second Patrol is to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the [Minimum Distance Requirements] MDRs and by identifying dead, dying, and declining trees that may fail and strike conductors."⁶

Additionally, PG&E's WMP initiative 8.2.2.2 Vegetation Inspections – Distribution includes "different types of patrols designed to comply with state and federal laws and regulations" including PRC section 4293,⁷ which requires the removal of dead, diseased, defective, and dying trees that could contact or fall onto conductors.⁸

Findings:

Energy Safety considers this deficiency as "Moderate" because PG&E has not removed the dying Jeffrey pine tree located within striking distance of conductors, consistent with the requirements of Public Resources Code section 4293. The continued presence of this tree presents an ongoing wildfire risk.

On April 8, 2026, Energy Safety conducted an inspection of PG&E's WMP's initiatives in the vicinity of Sutter Creek, California. During the inspection, Energy Safety identified a dying Jeffrey pine tree near a pole listed as "Support Structure ID 101262415" in PG&E's Q4 2025 spatial QDR asset layer. The pole was marked with an address marker reading "14000" and is near coordinates 38.44392947856192, -120.76739774096828 along Echo Drive. The Jeffrey pine tree is located within the SRA. The Jeffrey pine tree is approximately 62 feet tall and is located approximately 28 feet from the conductors and south of the pole. The inspector's observations are documented in Exhibit A photographs, which are attached to this report. Photo 1 depicts pole with the "14000" address marker. Photos 2, 3, 4 and 5 depict the dying Jeffrey pine tree.

⁶ PG&E "2023-2025 Base WMP", published February 13, 2025. p. 691
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true> accessed April 9, 2026).

⁷ PG&E "2023-2025 Base WMP", published February 13, 2025. p. 670
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true> accessed April 9, 2026).

⁸ https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4293.&lawCode=PRC, accessed April 9, 2026.

Exhibits

Exhibit A: Photo Log

Support Structure ID: 101262415

Deficiency 1



Photo 1: Photo of pole marked with an "14000" address marker.

Photo 2: Photo of dying Jeffrey pine located south of the pole.



Photo 3: Photo of the dying Jeffrey pine tree near the conductor.



Photo 4: Photo of the dying Jeffrey pine tree showing discoloration and thinning needles at its canopy.



Photo 5: Additional photo of the dying Jeffrey pine tree near the conductors and the pole.