



April 24, 2026

Daniel Kushner  
Senior Director, Electric Risk & Compliance  
Pacific Gas and Electric Company  
300 Lakeside Drive  
Oakland, CA 94612

## NOTICE OF NON-PERFORMANCE

Mr. Kushner:

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

On December 17, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Greenbrae, California. The inspection report is enclosed herewith. 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 120165952, Grid Hardening ID 31700387 at coordinates 37.9416516298664, -122.560765100057. 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 from date of this notice.

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

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket,<sup>1</sup> and the associated file name(s) must begin with the NON identification number.

Prior to its response, the electrical corporation 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

---

<sup>1</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

deadline.<sup>2</sup> Requests for informal conference with Energy Safety must be e-mailed to [AssetPerformance@energysafety.ca.gov](mailto:AssetPerformance@energysafety.ca.gov), with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,

*Patrick Doherty*

Patrick Doherty  
Program Manager | Performance Assessment Division  
Office of Energy Infrastructure Safety  
[Patrick.Doherty@energysafety.ca.gov](mailto:Patrick.Doherty@energysafety.ca.gov)

Cc:

Mandy Knockaert, PG&E

[ARKN@pge.com](mailto:ARKN@pge.com)

Rahima Manderola, PG&E

[R12W@pge.com](mailto:R12W@pge.com)

Savannah Torres, PG&E

[S6KZ@pge.com](mailto:S6KZ@pge.com)

Electric Data Requests

[ElectricDataRequests@pge.com](mailto:ElectricDataRequests@pge.com)

WS Compliance, PG&E

[WSComplianceMailbox@pge.com](mailto:WSComplianceMailbox@pge.com)

Alexander Scott, Energy Safety

[Alexander.Scott@energysafety.ca.gov](mailto:Alexander.Scott@energysafety.ca.gov)

Babak Kaviani, Energy Safety

[Babak.Kaviani@energysafety.ca.gov](mailto:Babak.Kaviani@energysafety.ca.gov)

Samuel Isaiah, Energy Safety

[Samuel.Isaiah@energysafety.ca.gov](mailto:Samuel.Isaiah@energysafety.ca.gov)

Shannon Greene, Energy Safety

[Shannon.Greene@energysafety.ca.gov](mailto:Shannon.Greene@energysafety.ca.gov)

[assetperformance@energysafety.ca.gov](mailto:assetperformance@energysafety.ca.gov)

---

<sup>2</sup> Energy Safety Performance Guidelines, p. 4



# INSPECTION REPORT

## Overview

### Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely affect an electrical corporation's wildfire risk.

A Notice of Non-Performance (NON) is issued for any deficiencies discovered during an inspection related to an electrical corporation's performance of its WMP.

### Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency.<sup>3</sup> If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines provided in Table 1.<sup>4</sup>

**Table 1. Risk Category and Correction Timelines**

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

<sup>3</sup> Gov. Code section 15475.2(a)(2)

<sup>4</sup> Energy Safety Performance Guidelines, p. 4



# Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies are provided in the Inspections Details Section below.

***Table 2: Inspection Location and Initiative Summary***

Electrical Corporation:	Pacific Gas and Electric Company
Report Number:	PAD_PGE_AXS_20251217_1426
Inspector:	Alexander Scott
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.10.5 – Non-Exempt Expulsion Fuses
Date of Inspection:	December 17, 2025
City and/or County of Inspection:	Greenbrae, Marin County
Inspection Purpose:	Assess the accuracy of Pacific Gas and Electric Company’s QDR data, completeness of its work, and performance of WMP requirements.

**Table 3: WMP Inspection Deficiencies**

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	120165952	31700387	37.9416516298664, -122.560765100057	Tier 3	8.1.2.10.5 - Non-Exempt Expulsion Fuses	Minor	Failure to complete work on non-exempt expulsion fuse replacement.

# Inspection Details

## Deficiency 1

### **Relevant Requirement:**

PG&E's WMP states the following regarding initiative number 8.1.2.10.5:

1. "This program reduces the consequence of potential ignitions by replacement and/or removal of non-exempt fuses. In general, the risk of ignition associated to a fuse on a line is reduced through the complete removal and/or replacement of non-exempt equipment with exempt equipment."<sup>5</sup>
2. "Pacific Gas and Electric Company is currently in the process of seeking exemption status for the Solid Blade switch. Until the exemption status is approved by CAL FIRE, PG&E will also continue to maintain a firebreak around the poles that have Solid Blade installation to provide additional control against any ignition risk."<sup>6</sup>

### **Findings:**

In the 2025 Q2 Quarterly Data Report submission, PG&E reported that work on WMP initiative 8.1.2.10.5 - Non-Exempt Expulsion Fuses was completed at Pole ID 120165952, Grid Hardening ID 31700387 at 309 Evergreen Dr, Greenbrae, CA, 94904, USA, 37.9416516298664, -122.560765100057. At this location the inspector observed that Solid Blade disconnects were installed without a 10-foot firebreak clearance. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers IA1Img1, IA1Img2, IA1Img3, and IA1Img4, depict Solid Blade disconnects without a 10-foot firebreak clearance.

Energy Safety concludes that there is a deficiency because of these facts:

1. Exempt fuses were not installed at the subject pole.
2. The inspector observed Solid Blade disconnects on the subject pole.
3. The inspector did not observe a 10-foot firebreak clearance around the subject pole.
4. No reclosers, sectionalizers, or voltage regulators were observed at the subject pole.

---

<sup>5</sup> Pacific Gas & Electric Company, "PG&E 2023-25 Approved Wildfire Mitigation Plan R8," February 13, 2025, p. 465. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true>

# Exhibits

Exhibit A: Photo Log

Structure ID: 120165952

Deficiency 1



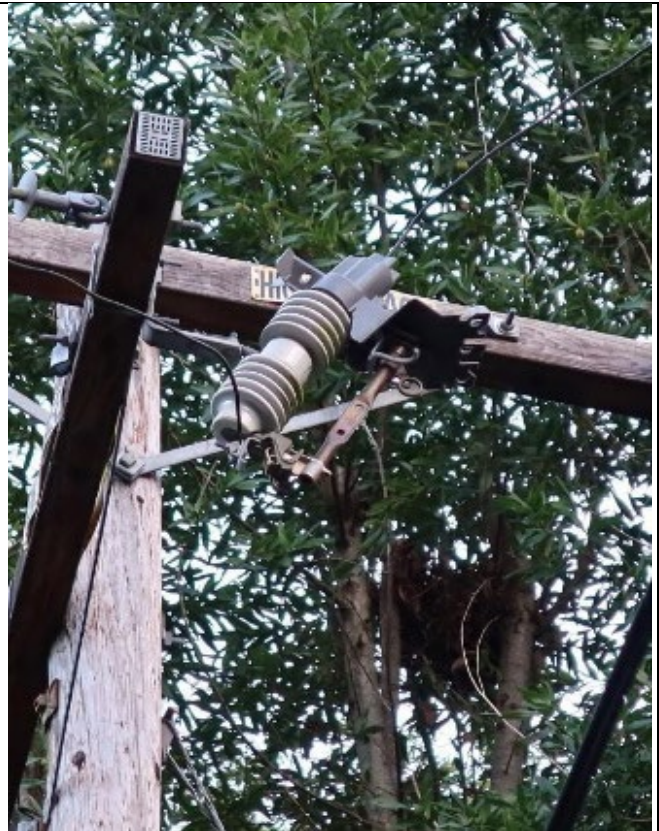
G1mg1: Overall Structure.



G1mg2: Structure ID.



**IA1Img1:** Pole not cleared.



**IA1Img2:** Solid blade disconnect one.



**IA1Img3:** Solid blade disconnect two.