

April 24, 2026

Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Energy Safety NON ID: PGE_NON_ESD_PGE_RGA_20260311_1117
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 Ms. Bilbrey:

This letter is in response to the above referenced Notice of Nonperformance (NON) dated March 26, 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 Q3 2025 QDR, in reference to a Wildfire Safety Concern (WSC) response reported to PG&E on December 19, 2025.

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.”

This NON was identified from a March 11, 2026 inspection by Energy Safety in the vicinity of Mokelumne Hill, California within High Fire Threat District (HFTD) Tier 2 and the State Responsibility Area (SRA). Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that PG&E failed to implement its 2025 WMP initiative 8.2.2.2, which requires compliance with Public Resource Code 4293, by not maintaining a four-foot clearance distance around the primary conductors near coordinates 38.30124, - 120.50330. 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.

Response

The subject tree, a cedar tree referenced in NON_ESD_PGE_RGA_20260311_1117.pdf, was assessed during a Second Patrol inspection conducted on October 6, 2025. At that time, PG&E assessed the subject tree as compliant with applicable regulatory minimum distance requirements. Subsequently, Electric Operations construction activities were performed on October 21, 2025, which modified the configuration of the facilities and a notification was created to address the minimum clearance requirements. The subject tree was removed on April 2, 2026, under RX-07295023 ("PGE_NON_ESD_PGE_RGA_1117_20260424_ATCH001_CONF.pdf")

Please refer to the following photos documenting the site cleanup and debris removal in Attachment "PGE_NON_ESD_PGE_RGA_1117_20260424_ATCH002.pdf".

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
Patrick Doherty, Program Manager, Energy Safety
Elizabeth McAlpine, Supervisory Environmental Scientist, Energy Safety
Ricardo Garcia, Field Inspector, Energy Safety