



April 29, 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 (PG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP). During the inspections, Energy Safety determined the existence of a 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 Challenge, California within High Fire Threat District (HFTD) Tier 3 and 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 (PRC) section 4293 by not removing a dead, declining or dying tree near coordinates 39.50091, -121.2778. 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 two 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 pole ID 121206460 in HFTD Tier 3. 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_RGA_20260408_0849
Inspector:	Ricardo Garcia
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 Q4 QDR.
Relevant WMP Initiative(s):	8.2.3.4 Fall-In Mitigation
Date of inspection:	April 8, 2026
City and/or County of Inspection:	Challenge, 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 13, 2026).

Inspection Findings

Deficiency 1

Relevant Requirements:

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 PRC Section 4293. Every year, we inspect trees along our entire distribution system— approximately 80,000 miles of overhead distribution lines. PG&E also performs scheduled Second Patrols with an approximate six-month offset from the routine patrol on overhead primary and secondary distribution facilities....The objective of the Second Patrol is to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the 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 Public Resources Code 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 pine tree located within striking distance of conductors, consistent with the requirements of PRC 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 Challenge, California. During the inspection, Energy Safety identified a dying pine tree near pole ID 121206460 and near coordinates 39.50091, -121.2778 along New York Flat Road. The pine tree is located within the SRA. The pine tree has a diameter at breast height of 17 inches and is approximately 80 feet tall. It is located approximately 175 feet south of pole ID 121206460 and 30 feet east of the conductors. The inspector's observations are documented in Exhibit A photographs which are attached to this report. Photo 1 depicts pole ID 121206460 and photo 2 depicts the dying pine tree (right).

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 13, 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 13, 2026).

⁸ https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4293.&lawCode=PRC, accessed April 13, 2026.

Exhibits

Exhibit A: Photo Log

Structure ID: 121206460

Deficiency 1



Photo1: Photo of pole ID 121206460 located approximately 175 feet north of the subject tree.



Photo 2: Photo of the dying pine tree (right). Refer NON_ESD_PGE_RGA_20260408_0836 regarding another dying pine tree shown on the left.