



May 4, 2026

Daniel Kushner

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Pacific Gas and Electric Company

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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 the town of Brownsville in 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 section 4293, by not removing a declining or dying pine tree near coordinates 39.47929647526301, -121.25189022605244 and near pole ID 121205801. Energy Safety considers this non-performance to be in the Minor risk category. PG&E must complete corrective action for this non-performance by twelve 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.

¹ Gov. Code section 15475.2(a)(2)

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

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 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

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³ Energy Safety Performance Guidelines, p. 4



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 “Minor” 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 “Minor” deficiency near pole ID 121205801 in HFTD Tier 3 and in SRA. PG&E failed to remove a 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_GCA_20260408_1333
Inspector:	Gary Candelas
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:	Brownsville, 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 16, 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 [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 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 "Minor" because PG&E has not removed the declining ponderosa 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 Brownville, California. During the inspection, Energy Safety identified a declining ponderosa pine tree found at coordinates 39.47929647526301, -121.25189022605244, at 9478 La Porte Road. The ponderosa pine tree is located within HFTD Tier 3 and the SRA. The tree is approximately 140 feet tall, located northeast of conductors and 37.6 feet east of pole ID 121205801. It exhibits yellowing needles throughout the canopy, though there are still green needles present. The inspector also observed insect burrows along the trunk and discolored bark, which are signs of a potential insect infestation. The inspector's observations are documented in Exhibit A photographs, which are attached to this report. Photo 1 depicts pole ID 121205801. Photo 2 shows the base of the ponderosa pine tree trunk. Photos 3 through 8 depict the declining ponderosa 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

Structure ID: 121205801

Deficiency 1



Photo 1: Photo of pole ID 121205801.



Photo 2: Photo of the base of the declining ponderosa pine tree with vines present around the trunk.



Photo 3: Photo of the declining ponderosa pine tree near pole ID 121205801.



Photo 4: Photo of the ponderosa pine tree located approximately 15-feet northeast of the conductors.



Photo 5: Photo of the ponderosa pine tree with yellowing needles in its canopy in relation to the conductors.



Photo 6: Photo showing yellowing needles and moss on the branches.



Photo 7: Photo of the ponderosa pine tree trunk showing insect burrows.



Photo 8: Photo of the ponderosa pine tree trunk with insect burrows and discolored bark.