



May 7, 2026

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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 a non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON).

On March 11, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of North San Juan, California, 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 in implementing 2025 WMP initiative 8.2.2.2.4, PG&E failed to adhere to its protocol of wood and slash management at Vegetation Management ID VP-10906572 and coordinates 39.407835, -121.057122. 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.

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 “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 coordinate 39.407835, -121.057122 in HFTD Tier 3. PG&E did not perform its Wood and Slash Management (WMP Initiative 8.2.3.2) program as required in the WMP, instead slash was left piled on site.

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_AKM_20260311_1348
Inspector:	Akiko Masuda
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):	8.2.3.2 Wood and Slash Management
Date of inspection:	March 11, 2026
City and/or County of Inspection:	North San Juan, Yuba County

Inspection Findings

Deficiency 1

Relevant Requirements:

PG&E's WMP initiative 8.2.3.2 Wood and Slash Management states that, "Utility work on vegetation creates debris and wood products which, if left unmanaged, can become fuel for wildfire. PG&E is required to reduce or adjust live fuels as they are generated from programs developed to comply with [Public Resources Code section] PRC 4293, General Order 95 Rule 35 and [Public Utilities Code] Pub. Util. Code 8386."⁵

PG&E's WMP continues by stating, "PG&E's [Vegetation Management] VM Programs define debris as material less than 4 inches in diameter and large wood as material greater than 4 inches in diameter... Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations..."⁶

PG&E's WMP also lists its Best Management Practices for Vegetation Management Activities (TD-7102P-01-JA01) as a governing standard for its slash management program.⁷ PG&E's protocol TD-7102P-01-JA01 states, "Woody debris created by chipping, lop and scatter, or brush mowing operations must be left at an average depth of less than 18 inches from the ground surface unless otherwise specified in an easement or landowner agreement."⁸

Findings:

Energy Safety considers this deficiency "Moderate" because the slash pile is over 18-inches in height, creating a potential fuel source for wildfire.

On March 11, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of North San Juan, California. During the inspection, Energy Safety observed woody debris left onsite near a pole listed as "Support Structure ID 100112200" in PG&E's Q4 2025 Spatial QDR asset layer. The pole had metal tags "55," "JP," and "JA" and is near coordinates 39.407835, -121.057122 along Alleghany Road. PG&E's 2025 Q4 QDR data reported that it completed work on September 30, 2025 under its Tree Removal Inventory program under VM ID VP_AV114-K19_564613, where a 15-inch diameter at breast height, 28-foot-tall black oak tree was removed. Energy Safety's inspector observed that two cut and dry black oak tree branches remained

⁵ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 277 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April 13, 2026)

⁶ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April 13, 2026).

⁷ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed April 13, 2026).

⁸ Pacific Gas and Electric Company. (n.d.). General best management practices for all VM (TD-7102P-01-JA01) (Rev. 1, Jan. 6, 2022), p. 12 (<https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-7102p-01-ja01-general-best-management-practices-for-all-vm.pdf>, accessed April 13, 2026)

onsite in piles approximately 35 and 47 inches tall. The branches have not been lopped into smaller pieces. The inspector's observations are documented in Exhibit A photographs, which are attached to this report. Photo 1 depicts metal tags "55," "JP," and "JA". Photos 2, 3, 4, and 5 depict the black oak tree branches left on site.

In response to a data request (no. OIES-E-INP_2026-PG&E-009), PG&E confirmed that the slash and woody debris at this site were created by PG&E's work and were associated with VMP ID VMP ID VP_VP-10906572.

Energy Safety issued a notice to PG&E in April 2025 for similar slash conditions identified in the Strawberry Valley area.⁹ In response to the notice NOV_ESD_PGE_MAZ_20250305_1026, PG&E conducted an audit of additional locations where the subcontractor performed work and identified additional properties requiring similar follow-up actions and cleanup. PG&E further stated that it subsequently notified the contractor of the identified conditions.¹⁰

⁹ NOV_ESD_PGE_MAZ_20250305_1026

(https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2024+NOV%2fTN15697_20250423T145847_NOV_ESD_PGE_MAZ_20250305_1026.pdf, accessed April 20, 2026)

¹⁰ NOV_ESD_PGE_MAZ_20250305_1026_Response

(<https://efiling.energysafety.ca.gov/efiling/Getfile.aspx?fileid=58706&shareable=true>, accessed April 14, 2026)

Exhibits

Exhibit A: Photo Log

Support Structure ID: 100112200

Deficiency 1



Photo 1: Photo of the metal tags “55y,” “JP,” and “JA” on the pole.



Photo 2: Photo of the first cut black oak tree branch, now dry, left onsite.



Photo 3: Photo of the second cut black oak tree branch, now dry, left onsite.



Photo 4: Photo of the first cut black oak tree branch measuring approximately 35 inches in height.



Photo 5: Photo of the second cut black oak tree branch measuring approximately 47 inches in height.