



May 7, 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 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 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 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 IDs VP_AV114-K19_562057 and VP_AV114-K19_561995 near coordinates 39.404803, -121.058301. 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

Elizabeth McAlpine

Supervisory Environmental Scientist | Environmental Science Division

Office of Energy Infrastructure Safety

Elizabeth.McApline@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

WSCComplianceMailbox@pge.com

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 39.404803, -121.058301 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_1409
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 Utility 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, 2026, 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 slash and woody debris left onsite near a pole listed as "Support Structure pole ID 103806418" in PG&E's Q4 2025 spatial QDR asset layer, located near coordinates 39.404803, -121.058301 along Alleghany Road. PG&E's 2025 Q4 data reported that it completed work at this location under its Tree Removal Inventory program under VMP IDs VP_AV114-K19_562057 and VP_AV114-K19_561995. Under VMP ID VP_AV114-K19_562057, PG&E removed a 25-inch diameter at breast height, 130-foot-tall ponderosa pine tree on November 13, 2025. Under VMP ID VP_AV114-K19_561995, PG&E removed a 15-inch diameter at breast height, 75-foot-tall ponderosa pine tree on October

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)

2, 2025. Energy Safety’s inspector observed that slash and woody debris from tree removal activities remained onsite, forming piles approximately 43 inches at its tallest point. The inspector’s observations are documented in Exhibit A photographs, which are attached to this report. Photos 1 and 2 depict the removed ponderosa pine tree trunks. Photos 3, 4, 5, and 6 depict the piles of wood and slash debris 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 was created by PG&E’s work associated with VMP ID VP_AV114-K19_562057 and VP_AV114-K19_561995.

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: 103806418

Deficiency 1

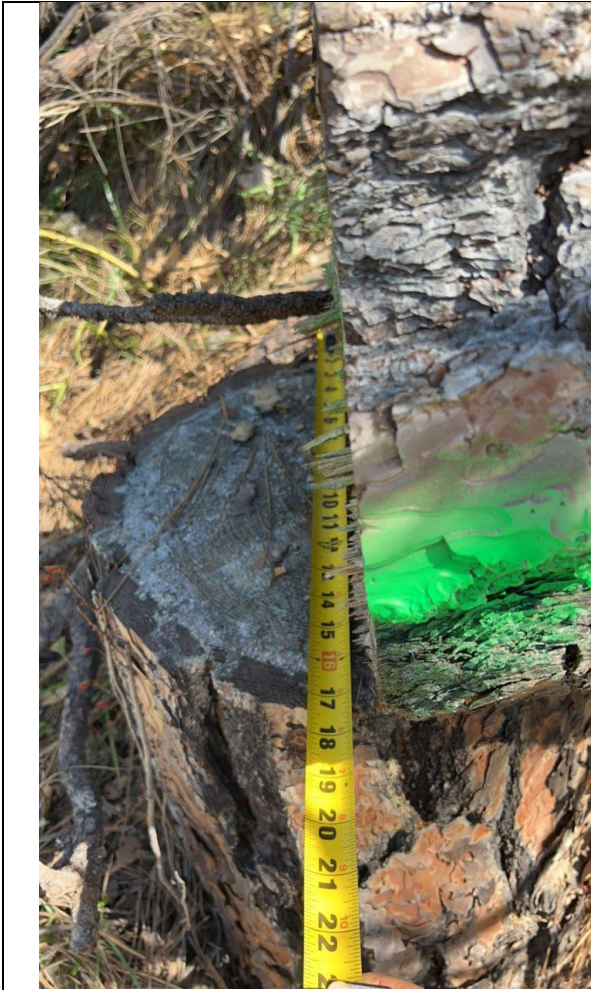


Photo 1: Photo of the ponderosa pine tree trunk measuring approximately 17 inches in diameter, consistent with the description for VMP ID VP_AV114-K19_561995.

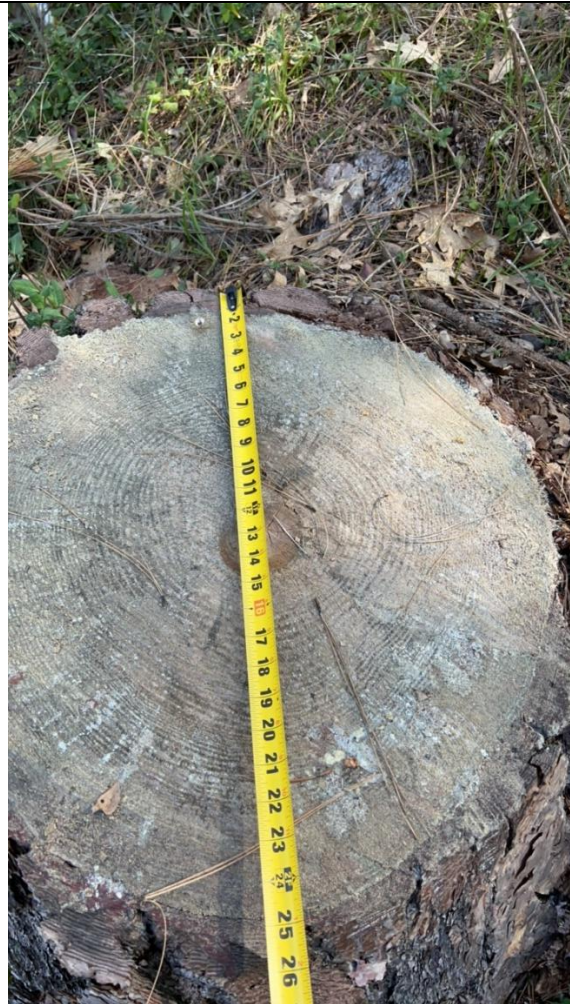


Photo 2: Photo of another ponderosa pine tree trunk measuring approximately 25 inches in diameter, consistent with the description for VMP ID VP_AV114-K19_562057.



Photo 3: Photo of the pile of wood and slash debris measuring approximately 43 inches in height.



Photo 4: Additional photo of the pile of wood and slash debris left onsite.



Photo 5: Additional photo of the pile of wood and slash debris left onsite.



Photo 6: Additional photo of the pile of wood and slash debris left onsite.