



May 12, 2026

Daniel Kushner

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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 (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 7, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Robinson Mill, CA, 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 near pole ID 121273879 and Vegetation Management ID VP_AT114-H05_3580428_2022 at coordinates 39.48531, -121.32264. 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

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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 coordinates 39.48531, -121.32264 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_RGA_20260407_1108
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):	8.2.3.2 Wood and Slash Management
Date of inspection:	April 7, 2026
City and/or County of Inspection:	Robinson Mill, California

Inspection Findings

Deficiency 1

Relevant Requirement:

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 April 7, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Robinson Mill, California. During the inspection, Energy Safety observed woody debris left onsite near pole ID 121273879 and coordinates 39.48531, -121.32264 along Robinson Mill Road. PG&E's 2025 Q4 data reported that it completed work on December 15, 2025, under its Tree Removal Inventory Program, under VMP ID VP_AT114-H05_3580428_2022, where an 18-inch diameter at breast height, 80-foot-tall gray pine tree was cut down. Energy Safety's inspector observed slash and woody debris from the vegetation management remained onsite, in piles approximately four feet tall. The inspector's observations are documented in Exhibit A photographs,

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 15, 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 15, 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 15, 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 15, 2026)

which are attached to this report. Photo 1 depicts pole ID 121273879. Photo 2 depicts the removed grey pine tree. Photos 3 and 4 depict the pile of wood and slash debris left on site.

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

Structure ID: 121273879

Deficiency 1



Photo 1: Photo of pole ID 121273879



Photo 2: Photo of the cut grey pine tree.



Photo 3: Photo of the pile of wood and slash debris measuring approximately four feet in height.



Photo 4: Photo of the pile of wood and slash debris.