



May 14, 2026

Daniel Kushner
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Pacific Gas and Electric Company
300 Lakeside Drive
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NOTICE OF NON-PERFORMANCE

Mr. Kushner:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Pacific Gas and Electric Company (PG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON), identifying non-performance with its approved WMP.

On November 5, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Greenwood, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing its 2025 WMP initiative related to Grid Design and System Hardening, PG&E failed to install covered conductor on Pole ID 121528551, Grid Hardening ID 35293664 at coordinates 38.8985125146323, -120.914299826552. Energy Safety considers this non-performance to be in the Minor risk category. PG&E must complete a corrective action for this deficiency by 12 months of this notice.

Within 30 days from the issuance date of this NON, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency or deficiencies.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket,¹ and the associated file name(s) must begin with the NON identification number.

Prior to its response, the electrical corporation 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

¹ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

deadline.² Requests for informal conference with Energy Safety must be e-mailed to AssetPerformance@energysafety.ca.gov, with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,

Patrick Doherty

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² Energy Safety Performance Guidelines, p. 4



INSPECTION REPORT

Overview

Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely affect an electrical corporation’s wildfire risk.

A Notice of Non-Performance (NON) is issued for any deficiencies discovered during an inspection related to an electrical corporation’s performance of its WMP.

Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency.³ If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines 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 or resolution scheduled in WMP update

³ Gov. Code section 15475.2(a)(2)

⁴ Energy Safety Performance Guidelines, p. 4



Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	Pacific Gas and Electric Company
Report Number:	PAD_PGE_BKA_20251105_1153
Inspector:	Babak Kaviani
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.1 - Covered conductor installation - Distribution
Date of Inspection:	November 5, 2025
City and/or County of Inspection:	Greenwood, El Dorado County
Inspection Purpose:	Assess the accuracy of Pacific Gas and Electric Company’s QDR data, completeness of its work, and performance of WMP requirements.

Table 3: WMP Inspection Deficiencies

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	121528551	35293664	38.8985125146323, -120.914299826552	Tier 2	8.1.2.1 - Covered conductor installation - Distribution	Minor	Failure to complete work on covered conductor installation.

Inspection Details

Deficiency 1

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.1.2.1 - Covered Conductor Installation – Distribution:

1. “[Covered conductor (CC)] installation involves the replacement of bare overhead primary conductor (voltage between 2-21 kV) and associated framing with conductor that is insulated with abrasion-resistant polyethylene coating (generally referred to as “covered conductor” and occasionally as “tree wire”). Installing CC can help reduce the likelihood of faults, and by extension ignitions, due to line-to-line contacts, tree-branch contacts, and faults caused by animals.”⁵

PG&E's 015195 R 08 Installation Details for Aluminum ACSR and Copper Covered Tree Wire:

1. When installing tap or dead-end connections on covered tree wire, remove only a sufficient amount of the conductor insulation to permit installing the tap or dead-end connector over the conductor. Always install dead-ends on bare conductor.
 - A. “Do not use piercing connectors for jumpers or taps. Use fired wedge connectors and cover any connectors and any exposed conductor with approved fired wedge covers.” “The use of approved medium voltage fusion tape (MVFT) is also approved (material code M390190). Install the MVFT per the following instructions:
 1. Begin the MVFT installation by placing the side without the plastic backing on the surface. As the tape is wrapped around the surface, remove the plastic backing so the tape is allowed to adhere to itself.
 2. Wrap two layers of MVFT at the starting point before continuing down the surface.
 3. Continue wrapping two layers of the MVFT applying a 2/3 overlap across the surface. Use sufficient tension to provide a snug fit. Do not stretch more than 10%.
 4. Once the desired area is covered with 2/3 overlap, complete the installation with a two-layer wrap at the end.”

Findings:

On Pole ID 121528551, Grid Hardening ID 35293664 at 4010 Main St, Greenwood, CA, 95635, USA, 38.8985125146323, -120.914299826552, the inspector observed that a portion of the covered conductor on the two outer phases on the southeast side of the pole was taped due to damage to the insulator. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report.

⁵ Pacific Gas & Electric Company, “PG&E 2023-25 Approved Wildfire Mitigation Plan,” January 8, 2024, p. 397. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>

Photo numbers IA1Img1, IA1Img2, and IA1Img3 depict tape applied over a portion of the covered conductor on the southeast side of the pole. In the 2025 Q2 Quarterly Data Report submission, PG&E reported that work on WMP initiative 8.1.2.1 -Covered Conductor Installation – Distribution was completed at this location.

Energy Safety concludes that there is a deficiency because of these facts:

1. The inspector observed that a portion of the covered conductor on the two outer phases on the southeast side of the pole was taped.

Exhibits

Exhibit A: Photo Log

Structure ID: 121528551

Deficiency 1



G1mg1: Overall Structure



G1mg2: Structure ID



IA1Img1: Overall view showing tape applied over the conductor on the southeast side of the pole 121528551.



IA1Img2: Close up view of one phase showing tape applied over the conductor on the southeast side of the pole 121528551



IA1Img3: Another phase showing tape applied over the conductor on the southeast side of the pole 121528551