

May 15, 2026

Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Energy Safety NON ID: NON_ESD_PGE_KJO_20260407_1125
Notice of Nonperformance: Government Code §§ 15475.1(a) and 15475.2(a)(2), and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2)

Dear Ms. Bilbrey:

This letter is in response to the above referenced Notice of Nonperformance (NON) dated April 15, 2026, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2025 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Q4 2025 QDR dataset.

Energy Safety based its compliance assessment on the following statute and code sections:

California Government Code Section 15475.1, states:

- (a) *The office may determine that a regulated entity is not in compliance with any matter under the authority of the office. If necessary, the office may undertake an investigation into whether the regulated entity is noncompliant with its duties and responsibilities or has otherwise committed violations of any laws, regulations, or guidelines within the authority of the office.*
- (b) *The office's primary objective is to ensure that regulated entities are reducing wildfire risk and complying with energy infrastructure safety measures as required by law.*

California Government Code Section 15475.2, states:

- (a) *The office may issue a notice of defect or violation to direct the regulated entity to correct any defect or noncompliance with the approved wildfire mitigation plan or failure to comply with any laws, regulations, or guidelines within the authority of the office.*

California Code of Regulations, Title 14, Section 29302(b)(2), "Investigations, Notices of Defect and Violation, and Referral to the Commission" states in part:

"The Director may designate a compliance officer to consider the findings of any investigation. The compliance officer may issue any of the following:

...

(2) Notice of violation, identifying noncompliance with an approved Wildfire Mitigation Plan or any law, regulation, or guideline within the authority of the Office.”

On April 7, 2026, Energy Safety conducted an inspection of PG&E’s WMP initiatives in the vicinity of the city of Pike, California in High Fire Threat District (HFTD) Tier 2 and State Responsibility Area (SRA). 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 dead, declining or dying tree near coordinates 39.44066589295085, -120.99568533516796. 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 six months from the date of this notice.

Response

PG&E acknowledges Energy Safety’s observation of the declining tree identified during their inspection performed on April 7, 2026, near coordinates 39.44066589295085, -120.99568533516796, in the vicinity of Pike, California. PG&E maintains its implementation of WMP initiative 8.2.3.4 of the 2025 WMP year and upon our completed inspection, we disagree that a nonperformance exists. During the routine patrol performed by PG&E on April 9, 2026 the subject tree was identified as “dead and dying” and prescribed for removal, as referenced in “*NON_ESD_PGE_KJO_20260407_1125_20260515_ATCH001_CONF.pdf*”. VM inspections occurred on March 28, 2025 and August 18, 2025 and no visible defects were present at the time of the respective inspections. The routine patrol and prescription occurred before this NON was issued, and PG&E considers this remediated in ordinary course.

The subject tree is located on United States Forest Service (USFS) agency land and is therefore subject to applicable environmental review and any necessary agency authorization before work can proceed. Once the subject tree has been released for this work to occur, PG&E will promptly schedule the removal of the subject tree., Additionally, please see attachment “*NON_ESD_PGE_KJO_20260407_1125_20260515_ATCH002_CONF.pdf*” stating PG&E’s April 24, 2026 Environmental Review submission for the subject tree.

Please do not hesitate to contact WSComplianceMailbox@pge.com if you have any questions regarding this matter.

Sincerely,
Daniel Kushner, PhD
Senior Director, Electric Risk & Compliance

cc: Samuel Isaiah, Senior Utilities Engineer Specialist, Energy Safety
Patrick Doherty, Program Manager, Energy Safety
Elizabeth McAlpine, Supervisory Environmental Scientist, Energy Safety
Kelsea Jones, Field Inspector, Energy Safety