

May 18, 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_20260408_1006
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 16, 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 8, 2026, Energy Safety conducted an inspection of PG&E’s WMP initiatives in the vicinity of Sutter Creek, California within High Fire Threat District (HFTD) Tier 2 and the 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 38.44392947856192, -120.76739774096828. 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

Initiative 8.2.3.4 of PG&E’s 2025 Wildfire Mitigation Plan (WMP) outlines an annual patrol of all distribution lines and scheduled Second Patrols with an approximate six-month offset from the routine patrol on overhead primary and secondary distribution facilities. While PG&E agrees with Energy Safety’s observation of the declining tree identified during their inspection completed on April 8, 2026, near coordinates 38.44392947856192, -120.76739774096828, in the vicinity of Sutter Creek, California, PG&E disagrees that a deficiency exists. During the annual patrol on December 30, 2025, the decline of the subject tree was not visible, and work was not necessary at the time.

PG&E listed the subject tree for removal under RX-07406380 and the work was completed on April 28, 2026.

Please see attachment “*NON_ESD_PGE_KJO_20260408_1006_20260518_ATCH001_CONF.pdf*” documenting the completed work order.

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
Max Zazzeron, Field Inspector,