

May 26, 2026

Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Energy Safety NON_PAD_PGE_AXS_20251216_1145
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 Mr. Doherty:

This letter is in response to the above referenced Notice of Nonperformance (NON) dated April 24, 2026, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2024 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Second Quarter (Q2) Quarterly Data Report (QDR).

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."*

This NON was identified from a December 16, 2025 inspection by Energy Safety conducted in the vicinity of the city of Mill Valley, California. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.1.2.10.5 - Non-Exempt Expulsion Fuses, PG&E failed to complete the installation of Non-Exempt Expulsion fuses on Pole ID 120219510 Grid Hardening ID 31660821 at coordinates 37.9082426099846, -122.548413700528. 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 from date of this notice

Response

Finding 1 - Exempt fuses were not installed at the subject pole.

PG&E agrees that exempt fuses are not installed on the subject pole. As described in the language of initiative 8.1.2.10.5 identified by Energy Safety: Non-exempt fuses may be replaced and/or removed as part of PG&E's Non-Exempt Expulsion Fuse program. In this instance, PG&E removed the non-exempt fuses from the subject pole, thus meeting the requirements of WMP initiative 8.1.2.10.5.

Finding 2 - The inspector observed Solid Blade disconnects on the subject pole.

PG&E agrees there are solid blade disconnects installed on this structure. The deployment of solid blade disconnects at this location is consistent with initiative 8.1.2.10.5.

Finding 3 - The inspector did not observe a 10 foot firebreak clearance around the subject pole.

PG&E agrees that on the December 16, 2025 inspection date, there was not a 10-foot firebreak clearance around the subject pole.

In the process of responding to this finding, we evaluated the language of initiative 8.1.2.10.5 identified by Energy Safety and determined that the commitment would have been made more clear by referencing the specific geographical locations where vegetation management inspection plan directed clearing to achieve the referenced 10-foot clearance.

The subject pole is located in a Local Responsibility Area (LRA) and would not have fallen within the Vegetation Control (VC) Program Scope according to the Procedure, TD-7112P-01, Vegetation Control.

As discussed with Energy Safety on May 7, 2026, PG&E would be maintaining a fire break on WMP initiative 8.1.2.10.5 poles not previously part of the Vegetation Control program. Please note that on May 21, 2026, outside of the scope of initiative 8.1.2.10.5, we established a 10-foot firebreak around this pole. Please see the following attachments for completion evidence at the location in question:

- *PGE_NON_PAD_AXS_20251216_1145_20260526_Atch001.jpeg*
- *PGE_NON_PAD_AXS_20251216_1145_20260526_Atch002.jpeg*
- *PGE_NON_PAD_AXS_20251216_1145_20260526_Atch003.jpeg*

Finding 4 - No reclosers, sectionalizers, or voltage regulators were observed at the subject pole.

PG&E agrees that there are no reclosers, sectionalizers or voltage regulators installed on the subject pole. As described in the language of initiative 8.1.2.10.5 identified by Energy Safety: Non-exempt fuses may be replaced and/or removed as part of PG&E's Non-Exempt Expulsion Fuse program. In this instance, PG&E removed the non-exempt fuses from the subject pole, thus meeting the requirements of WMP initiative 8.1.2.10.5.

In summary, PG&E believes that these four findings do not constitute a non-performance.

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
Yana Loginova, Program Manager, Energy Safety
Shannon Greene, Program & Project Supervisor, Energy Safety
Alexander Scott, Field Inspector, Energy Safety