

June 1, 2026

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

RE: Energy Safety NON ID: PGE_NON_ESD_AKM_20260311_1138 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. McAlpine:

This letter is in response to the above referenced Notice of Nonperformance (NON) dated May 1, 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, in reference to a Wildfire Safety Concern (WSC) response reported to PG&E on February 1, 2026.

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 March 11, 2026, Energy Safety conducted an inspection of PG&E’s WMP initiatives in the vicinity of the city of North San Juan, California within High Fire Threat District (HFTD) Tier 3 and State Responsibility Area (SRA). 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 at Vegetation Management ID VP_AV114-K19_550169 and coordinates 39.409452, -121.059311. 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.

Response

We acknowledge that some portion of the subject debris may have exceeded 18-inches, however the average depth of the debris left on site did not exceed 18-inches, which is acceptable as outlined in PG&E’s guidance document TD-7102P-01-JA01 *Best Management Practices* (BMP 27). Therefore, we disagree that a non-performance exists.

Notwithstanding the above, to address the concerns identified by this notice, PG&E chipped and removed all subject debris on May 18, 2026, as shown in the attachment:

“PGE_NON_ESD_AKM_20260311_1138_20260601_Atch001.jpeg”

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
Akiko Masuda, Field Inspector, Energy Safety