

June 11, 2026

Elizabeth McAlpine  
Supervisory Environmental Scientist | Environmental Science Division  
Office of Energy Infrastructure Safety  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

RE: Energy Safety NON ID: ESD\_PGE\_RGA\_20250407\_1108  
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 12, 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 Fourth Quarter (Q4) 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.”*

The NON was identified from an April 7, 2026 inspection by Energy Safety in the vicinity of the city of Robinson Mill, CA, a High Fire Threat District (HFTD) Tier 3 and State Responsibility Area (SRA) of PG&E’s Q4 QDR report for WMP Initiative 8.2.2.2.4:

*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 near pole ID 121273879 and Vegetation Management ID VP\_AT114-H05\_3580428\_2022 at coordinates 39.48531, -121.32264.*

## **Response**

PG&E acknowledges Energy Safety’s observation and finding of a deficiency for failure to adhere to protocol of wood and slash management near pole ID 12123879 and Vegetation Management ID VP\_AT114-H05\_3580428\_2022 at coordinates 39.48531, -121.32264, and agrees with the non-performance.

Work performed at VP\_AT114-H05\_3580428\_2022 was confirmed to have slash left at the location after PG&E removed the tree on December 16, 2025.

PG&E has corrected the issue by removing the debris on May 26, 2026 for VP\_A T114-H05\_3580428\_2022 in accordance with Best Management Practices (BMP) 27.

Please see the following attachments showing the debris removed from the subject location:

- *PGE\_NON\_ESD\_RGA\_20260407\_1108\_20260611\_ATCH001.jpeg*
- *PGE\_NON\_ESD\_RGA\_20260407\_1108\_20260611\_ATCH002.jpeg*

Please do not hesitate to contact [WSComplianceMailbox@pge.com](mailto: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  
Shannon Greene, Program & Project Supervisor, Energy Safety  
Ricardo Garcia, Field Inspector, Energy Safety