

June 1, 2026

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

RE: Energy Safety NON_PAD_PGE_AXS_20251215_1459
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 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 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.”

On December 15, 2025, Energy Safety conducted an inspection of PG&E’s WMP initiatives 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 ID121984759, Grid Hardening ID 31660824 at coordinates 37.9077766303321, -122.549990099511. 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

We acknowledge Energy Safety’s observation of Non-Exempt Expulsion fuses on Pole ID 121984759, Grid Hardening ID 31660824 at coordinates 37.9077766303321, -122.549990099511 on December 15, 2025. The records used to provide the 2025 Q2 Quarterly Data Report submission show that we completed the removal of Non-Exempt 10T fuses and replaced them with Exempt 10E expulsion fuses under PM 31660824, on April 4, 2025.

See attachments “*PGE_NON_AXS_20251215_1459_20260601_Atch001_CONF.pdf*” for job completion and “*PGE_NON_AXS_20251215_1459_20260601_Atch002_CONF.pdf*” for overhead QC Audit.

Subsequently, however, on April 22, 2025 we completed an emergency pole replacement that mistakenly included the replacement of the Exempt fuses with Non-Exempt fuses on PM 35635565, documented by this attachment: “*PGE_NON_AXS_20251215_1459_20260601_Atch003_CONF.pdf*”.

On May 29, 2026, we replaced Non-Exempt fuses with the Exempt expulsion fuses as documented by these two pictures:

- *PGE_NON_AXS_20251215_1459_20260601_Atch004.jpeg*
- *PGE_NON_AXS_20251215_1459_20260601_Atch005.jpeg*

Based on the information provided above, PG&E does not agree this constitutes as a non-performance.

Please do not hesitate to contact WSCComplianceMailbox@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