

June 12, 2026

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

RE: Energy Safety NON ID: PAD_PGE_BKA_20251105_1153
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 14, 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.”

The NON was identified from an November 5, 2025 inspection by Energy Safety in the vicinity of the city of Greenwood, CA, a High Fire Threat District (HFTD) Tier 2 of PG&E’s Q2 QDR report for WMP Initiative 8.1.2.1 – Covered Conductor Installation - Distribution, Utility Initiative GH-02:

Deficiency 1. Energy Safety observed that in implementing its 2025 WMP initiative related to Grid Design and System Hardening, PG&E failed to install covered conductor on Pole ID 121528551, Grid Hardening ID 35293664 at coordinates 38.8985125146323, -120.914299826552. 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 of this notice.

Response

PG&E conducted a field visit at the location identified by Energy Safety in May 29, 2026, and provides the following findings:

- The referenced Pole ID 121528551 is not associated with Grid Hardening ID (also referred to as Plant Maintenance, or PM, order) 35293664 but is located one pole north of that PM order and, instead, is associated with PM 35293663. Please see attachment “*PGE_NON_PAD_BKA_20251105_1153_20260612_ATCH001_CONF.pdf*” for the snapshot of the construction drawings for PM orders 35293664 and 35293663, with the referenced pole circled in red for reference. The pole is included in the scope for PM 35293663, which was completed in 2023.
- The tree wire at the referenced pole was intentionally stripped at that location to allow for grounding and subsequently covered with medium voltage fusion tape (MVFT).
- The application of MVFT at this location is consistent with PG&E Standard 015195, Rev. 08 (Installation Details for Aluminum ACSR, and Copper Covered Tree Wire). Applicable requirements are outlined on Page 2, Note 6.
 - *“Mid-span splices are not allowed for new construction or reconstruction work. If needed during maintenance or emergency work, use only compression splices. Use approved medium voltage fusion tape (MVFT) (material code M390190) or gel wrap to cover the compression splice.”*

Based on the above findings, PG&E concludes that the installation at Pole ID 121528551, associated with PM 35293663, is compliant with PG&E Standard 015195, Rev. 08. PG&E disagrees, therefore, that a nonperformance exists.

Additionally, PG&E welcomes a continued discussion on how to best utilize the data provided in the QDR due to constraints created by reporting guidelines and timing limitations.

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
Babak Kaviani, Field Inspector, Energy Safety