Pacific Gas and Electric Company®

Daniel Kushner, PhD
Senior Director, Electric Risk & Compliance

300 Lakeside Dr.
Oakland, CA 94612
Email: Daniel.Kushner@pge.com

August 17, 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_AXS_20251118_1057
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 July 17, 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."

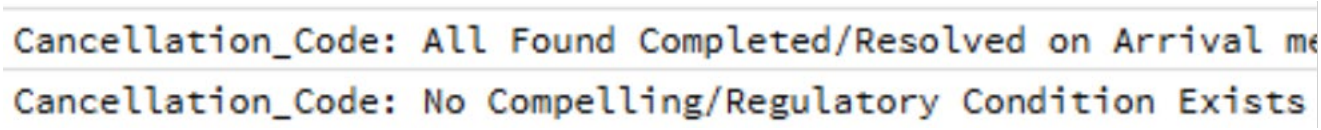
The NON was identified from a November 18, 2025 inspection by Energy Safety in the vicinity of the city of Santa Ynez, CA, a Tier 2 Fire Threat District (HFTD) of PG&E's Q2 QDR report for WMP Initiative 8.1.7.2 – Open Work Orders – Distribution Tags, Utility Initiative GM-03:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.1.7.2 - Backlog Ignition Risk Reduction, PG&E failed to complete work on open work orders - distribution tags on Pole ID 121424772, Grid Hardening ID 124437925 at coordinates 34.677828396863, -120.083991788946.

Response

PG&E acknowledges Energy Safety's November 18, 2025, observation of incomplete work on Pole ID 121424772, Grid Hardening ID 124437925 at coordinates 34.677828396863, -120.083991788946, but disagrees that a non-performance exists. An inspection performed on May 22, 2025, revealed that pole reinforcement work did not need to be completed, per PG&E guidelines (TD-2325P-01), which resulted in the tags being cancelled. PG&E reported in its 2025 Q2 QDR that the work was marked "complete" instead of cancelled, in order to align with the parameters of the reporting guidelines. Additionally, PG&E performed an inspection on August 3, 2026, and resulted in a passing inspection. Please see attachment "*PGE_NON_PAD_AXS_20251118_1057_20260817_ATCH001_Redacted.pdf*" for details on the August 3, 2026 inspection.

PG&E may cancel EC tags that are in scope for the GM-03 Open Tag Reduction – Distribution program for a variety of reasons. Due to the schema specified in the GIS Data Standards, when we need to report on these cancelled tags, we have had to report the *GH Status* as *Closed* because there is no *Cancelled* option. Additionally, as of our 2026 Q2 reporting, we have begun proactively providing the *Cancellation Code* data in the *FieldNotes* field to provide Energy Safety with greater transparency when a tag has been cancelled, including the reason for the cancellation. See example below.



Example Cancellation Code data from PG&E's 2026 Q2 filing

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