Pacific Gas and Electric Company®

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

RE: Energy Safety NON ID: NON_ESD_PGE_GCA_20260408_1333
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 provides a supplemental response to PG&E's letter to Energy Safety dated June 4, 2026, in reference to the above Notice of Nonperformance (NON) dated May 4, 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 the Q4 QDR 2025 data set.

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 April 8, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the town of Brownsville in High Fire Threat District (HFTD) Tier 3 and State Responsibility Area (SRA). Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that PG&E failed to implement its 2025 WMP initiative 8.2.3.4, which requires compliance with Public Resources Code section 4293, by not removing a declining or dying pine tree near coordinates 39.47929647526301, -121.25189022605244 and near pole ID 121205801. Energy Safety considers this non-performance to be in the Minor risk category. PG&E must complete corrective action for this non-performance by twelve months from the date of this notice.

Response

PG&E acknowledges Energy Safety's observation of the declining tree identified during their inspection performed on April 8, 2026, near coordinates 39.47929647526301, -121.25189022605244 and near pole ID 121205801, in the vicinity of Brownsville, California.

PG&E disagrees that a non-performance exists; PG&E's WMP initiative 8.2.3.4. states "actions taken to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment." The initiative includes an annual patrol of all PG&E distribution lines and second patrols with an approximate six-month offset from the routine patrol on overhead and secondary distribution lines.

PG&E inspected the subject tree on October 20, 2025 without findings, as referenced in the attachment "*PGE_NON_ESD_GCA_20260408_1333_20260604_Atch001_CONF.pdf*". The span was later inspected on May 8, 2026, when the inspector identified the subject tree for removal under RX-07527304, as referenced in attachment "*PGE_NON_ESD_GCA_20260408_1333_20260604_ATCH002_CONF.pdf*".

Please note that PG&E's inspection occurred after the Energy Safety inspector was in the field, but prior to PG&E receiving and being notified of this notice from Energy Safety.

PG&E plans to remove the subject tree no later than May 4, 2027, which will align with the 12-month corrective action timeline as identified in Table 1, included in Energy Safety's Notice of Non-Performance (NON) dated May 4, 2026.

Supplemental Response

PG&E has completed removal of the subject tree near coordinates 39.47929647526301, -121.2518902260524, pole ID 121205801, on June 22, 2026.

Please see the following attachments for photos of the completed work:

- "*PGE_NON_ESD_GCA_20260408_1333_20260910_ATCH001_Redacted.pdf*"

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
Sheryl Bilbrey, Program Manager, Energy Safety
Gary Candelas, Field Inspector, Energy Safety