State of California – A Natural Resources Agency
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Gavin Newsom, Governor
Forest Kaser, Director

September 16, 2026

Daniel Kushner
Senior Director, Electric Risk & Compliance
Pacific Gas and Electric Company
300 Lakeside Drive
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NOTICE OF NON-PERFORMANCE

Mr. Kushner:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Pacific Gas and Electric Company (PG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON), identifying non-performance with its approved WMP.

On March 26, 2026, Energy Safety conducted an inspection of Pacific Gas and Electric Company's WMP initiatives in the vicinity of the city of Grass Valley, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.1.7.2 – Open Work Orders – Distribution Tags, PG&E failed to complete work on an open work order – distribution tag on pole 121966441, Grid Hardening ID 127078561 at coordinates 39.1348623319746, -121.052275988987. 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.[1]

Within 30 days from the issuance date of this NON, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency or deficiencies.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket,[2] and the associated file name(s) must begin with the NON identification number.

Prior to its response, the electrical corporation may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than 10 business days before the response

[1] Gov. Code section 15475.2(a)(2)
[2] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON

deadline.[3] Requests for informal conference with Energy Safety must be e-mailed to assetperformance@energysafety.ca.gov, with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,

/s/ Patrick Doherty

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[3] Energy Safety Performance Guidelines, p. 4

INSPECTION REPORT

Overview

Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely affect an electrical corporation's wildfire risk.

A Notice of Non-Performance (NON) is issued for any deficiencies discovered during an inspection related to an electrical corporation's performance of its WMP.

Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency.[4] If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines provided in Table 1.[5]

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency correction timeline
Severe	• Immediate resolution
Moderate	• 2 months (in High Fire Threat District (HFTD) Tier 3) • 6 months (in HFTD Tier 2) • 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	• 12 months or resolution scheduled in WMP update

[4] Gov. Code section 15475.2(a)(2)
[5] Energy Safety Performance Guidelines, p. 4

Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies are provided in the Inspections Details section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	Pacific Gas and Electric Company
Report Number:	PAD_PGE_IAG_20260326_1214
Inspector:	Ivan Garcia
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.7.2 – Open Work Orders – Distribution Tags
Date of Inspection:	March 26, 2026
City and/or County of Inspection:	Grass Valley, Nevada County
Inspection Purpose:	Assess the accuracy of Pacific Gas and Electric Company's QDR data, completeness of its work, and performance of WMP requirements.

Table 3: WMP Inspection Deficiency

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	121966441	127078561	39.1348623319746, -121.052275988987	Non-HFTD	8.1.7.2 – Open Work Orders –Distribution Tags	Minor	Failure to complete work on Open Work Orders - Distribution Tags

Inspection Details

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.1.7.2:

1. PG&E's Plan for Eliminating the Backlog of Open Work Orders, Remedy c(i), Field Safety Reassessment (FSR) states the following: *"Inspectors can also recommend that a notification be canceled if they believe it was created in error or if it was already completed. For example, if the tag is no longer required according to PG&E's guidelines, or if they find all work identified on the EC notification is already completed in the field."*[6]
2. TABLE RN-PG&E-23-04-5 within PG&E's WMP Illustrates the drivers of increased find rates and refers to a document titled TD-2305M-JA02[7] as describing the criteria used during inspection evaluations related to initiative 8.1.7.2.

Findings:

On Structure ID 121966441, Grid Hardening ID 127078561 at 11737 Tammy Way, Grass Valley, CA, 95949, USA, 39.1348623319746, -121.052275988987, the inspector observed a woodpecker hole greater than one (1) inch in diameter and within two (2) inches of attachment hardware at this location. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers IA1Img1 and IA1Img2 depict a woodpecker (WP) hole present near the top of the pole and Item1IB1Img1-1, Item1IB1Img1-2, and Item1IB1Img1-3 are references used to evaluate the pole condition. In the 2025 Q4 Quarterly Data Report submission, PG&E reported that work on WMP initiative 8.1.7.2 – Open Work Orders – Distribution Tags was completed at this location.

Energy Safety concludes that there is a deficiency because of these facts:

1. A distribution tag that had been created for the inspection location was cancelled and found not be "non-compelling per updated TD-2305M-JA02, Rev. 14" according to PG&E's distribution tag long text.
2. Inspector observed a woodpecker hole greater than one (1) inch in diameter and within two (2) inches of attachment hardware at this location.
3. Woodpecker holes greater than (1) inch in diameter and within two (2) inches of attachment hardware warrants pole reframe or replacement per PG&E document TD-2305M-JA02, Rev. 14.

[6] Pacific Gas & Electric Company, "PG&E 2023-25 Approved Wildfire Mitigation Plan R8," February 13, 2025, p. 537. [Online]. Available: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true

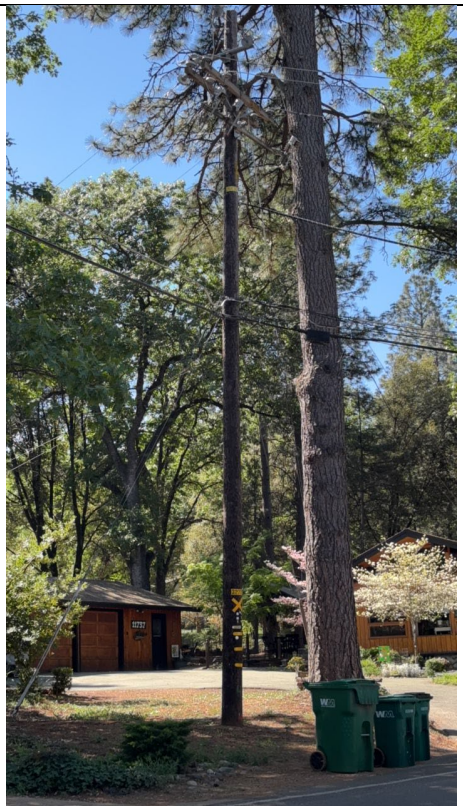
[7] Pacific Gas and Electric Company Job Aid: Overhead Assessment. https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-2305m-ja02-overhead-assessment.pdf

Exhibits

Exhibit A: Photo Log

Structure ID: 121966441

Deficiency 1

	
GImg1: Overall Structure.	**GImg2**: Structure ID.

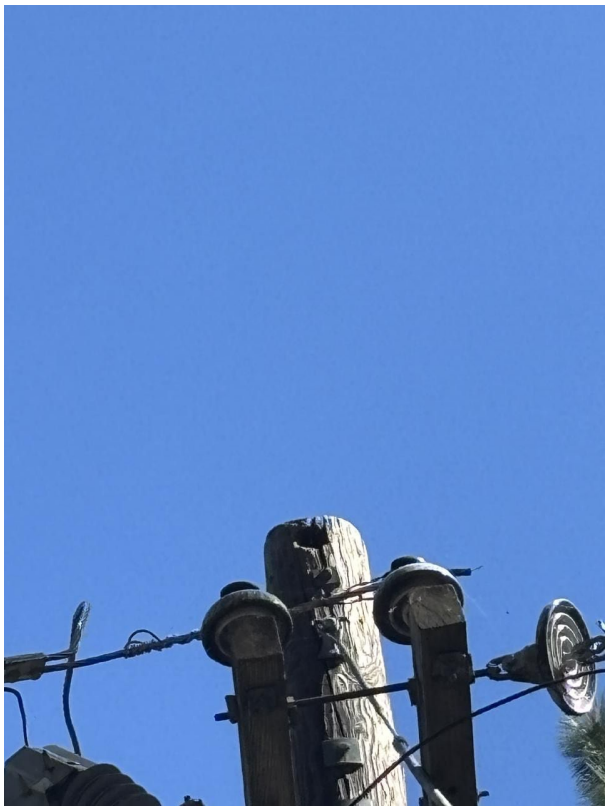
	
IA1Img1: WP hole view 1.	**IA1Img2**: WP hole view 2.

Exhibit B: Photo Log

Construction Standard: TD-2305M-JA02, Document number 066209, and Table RN-PG&E 23-04-5 (Taken from current WMP)

Deficiency 1

WOODPECKER DAMAGE 1-3 INCHES



At this Location: Single hole 1-3 inches within 2 inches from attachment hardware.

Perform Minor Work: No

Write 3rd Party Notification: No

Write EC Notification: Yes

FDA= Pole / Woodpecker Damage / Replace or Pole / Broken Damage / Reframe*

Priority= Minimum E Tag, depending on exposure.

Note: Inspector should use judgement on if pole can be reframed instead of replaced

Item1IB1Img1-1: Pacific Gas and Electric Company TD-2305M-JA02 REV 14, pg. 55

Woodpecker

General Guidance: Visually inspect poles for woodpecker damage based on the flow chart below.

- A through hole counts as two holes
- A filled hole is still considered a hole.
- Consider reframe instead of replacing where possible.



Item1IB1Img1-2: Pacific Gas and Electric Company TD-2305M-JA02 REV 14, pg. 52.

TABLE RN-PG&E-23-04-5:
DRIVERS OF INCREASED FIND RATES, E TAGS IN THE HFTD

F-D-A	2023 Tags	Delta Find Rate	Guidance Change	Highlighted by QA/QC in 2022	2023 Training Emphasis	Notes
Pole Decayed/Rotten Replace	3,736	155	X		X	Job Aid to 2305M JA02 was updated in 2023 with examples and more pictures on how to identify rotten poles. The topic was also highlighted as part of 2023 training. Refer to page 162-164 of TD 2305M JA02 Rev. 11 for more details.[a]
Pole Woodpecker Damage Assessment	2,830	114	X		X	Job Aid to 2305M JA02 was updated in 2023 with examples and more pictures on how to identify woodpecker damage on poles. The topic was also highlighted as part of 2023 training. Refer to page 168 of TD 2305M JA02 Rev. 11 for more details.
Hardware/Framing Loose Adjust	2,907	608	X		X	Job Aid to 2305M JA02 was updated in 2023 with new guidance on identifying Cotter Key partially backed out. This condition was also tagged with Hardware/Loose/Adjust PDA. Refer to page 122 of TD 2305M JA 02 Rev. 11 for more details.
Pole Woodpecker Damage Replace	1,904	New FDA	X		X	This was a new FDA added in 2023 in SAP. Job Aid TD 2305M JA02 was updated in 2023 with new guidance to directly create a Woodpecker Damage/replace tag if the damage is sufficient or if the woodpecker holes are near the framing hardware. Refer to page 168 and 169 of TD 2305M JA02 Rev. 11 for more details.
Pole Woodpecker Damage Repair	1,288	New FDA	X		X	This was a new FDA added in 2023 in SAP. This allows inspectors to directly create a Woodpecker Damage/Replace tag and they determine if the damage can be repaired or needs to be replaced.
Guy Loose Adjust	1,208	212	X	X	X	Job Aid TD 2305M JA02 was updated in 2023 to provide further clarification that any guy that is 2" from taut should be tagged as Guy/Loose/Adjust in addition this condition highlighted as part of the QA/QC findings in 2022.

(a) See Appendix E for Job Aid to 2305M JA02, Rev. 11.

Item1IB1Img1-3: Pacific Gas and Electric Company WMP Table RN-PG&E 23-04-5.