State of California – A Natural Resources Agency
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Gavin Newsom, Governor
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September 16, 2026

Daniel Kushner
Senior Director, Electric Risk & Compliance
Pacific Gas and Electric Company
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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 July 7, 2026, Energy Safety conducted an inspection of Pacific Gas and Electric Company's WMP initiatives in the vicinity of the city of Carmel, 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 open work orders – distribution tags on Structure ID 120117012, Grid Hardening ID 126421199 at coordinates 36.4952753089988, -121.933241758977. 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

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation pursuant to 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.

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_RMA_20260707_1132
Inspector:	Romeo Marroquin Ajcac
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:	July 7, 2026
City and/or County of Inspection:	Carmel, Monterey 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	120117012	126421199	36.4952753089988, -121.933241758977	Tier 2	8.1.7.2 – Work Orders – Distribution Tags	Minor	Failure to complete work on Work Orders – Distribution Tags

Inspection Details

Relevant Requirement:
PGE's WMP states the following regarding initiative number 8.1.7.2:

1. Under PG&E's Plan for Eliminating the Backlog of Open Work Orders, Remedy c(i). Field Safety Reassessment (FSR). *"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]

PG&E's TD-2305M-JA02-Overhead-Assessment-Rev 14 (Effective 1/14/2025):

1. Under general guidance for slack of down guys: "Pole must be straight with Guy no more than an arm's length (3ft) from taut, that does not have significant impact on the structural integrity of the pole."[7]

PG&E's TD-2305M-JA02-Overhead-Assessment-Rev 15 (Effective 1/15/2026):

1. Under general guidance of slack of down guys: "Per GO 95, for anchor guy with minimal slack where a pole is straight or leaning towards the anchor, the minimal slack (e.g., no more than 2" from taut) does not have a significant impact on the pole's structural integrity. The risk of potential harm to the worker associated with correction outweighs the risk of harm from not correcting; therefore, it is reasonable to address the correction as opportunity maintenance"[8]

Findings:
On Structure ID 120117012, Grid Hardening ID 126421199 at 200-228 Peter Pan Rd, Carmel, CA, 93923, USA, 36.4952753089988, -121.933241758977, the inspector observed a visibly slack down guy (more than 2 inches from taut). Although the QDR was submitted when revision 14 of the job aid was applicable, the inspection took place when revision 15 of the job aid was in place, therefore, the risk is still present. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers Asset Image 1, Asset Image 2, and Asset Image 3 depict a slack down guy. 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 were completed at this location.

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

1. Distribution tag 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. The inspector observed a slack down guy (more than 2 inches from taut).

[6] Pacific Gas & Electric Company, "PG&E 2023-25 Approved Wildfire Mitigation Plan R8," February 13, 2025, p. 554. [Online]. Available: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true
[7] Pacific Gas and Electric Company Job Aid: Overhead Assessment, rev 14, p. 214. Available: TD-2305M-JA02, R 14, Overhead Assessment Job Aid
[8] Pacific Gas and Electric Company Job Aid: Overhead Assessment, rev 15, p. 186. Available: TD-2305M-JA02, R 15, Overhead Assessment Job Aid

Exhibits

Exhibit A: Photo Log

Structure ID: 120117012

Deficiency 1

	
General Image 1: Overall Structure.	**General Image 2**: Structure ID.

	
Asset Image 1: Slack down guy (first from left).	**Asset Image 2**: Second view of slack down guy (first from left).