Pacific Gas and Electric Company®

Daniel Kushner, PhD
Senior Director, Electric Risk & Compliance

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

October 16, 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_IAG_20260326_1214
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 September 16, 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 Fourth Quarter (Q4) 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 March 26, 2026 inspection by Energy Safety in the vicinity of the city of Grass Valley, CA, a Non-High Fire Threat District (HFTD) of PG&E's Q4 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 – 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.

Response

PG&E acknowledges Energy Safety's observation of incomplete work on Structure ID 121966441 at coordinates 39.1348623319746, -121.052275988987, identified on March 26, 2026. On October 14, 2025, the tag was cancelled upon the completion of an internal review that concluded, "no compelling condition existed." At the time of Energy Safety's inspection, the woodpecker damage on the pole did not meet the requirements for replacement because the subject single woodpecker hole referenced in this notice was within 1-3 inches in diameter and more than 2 inches away from any attachment hardware, which is acceptable per woodpecker guidance documented in TD-2305M-JA02 (Rev.14; pg. 52) and TD-2305M-JA02-B005 (effective February 14, 2025). Therefore, PG&E disagrees that a non-performance exists.

For reference, please see the following attachment:

- *"PGE_NON_PAD_IAG_20260326_1214_20261016_ATCH001_Redacted.pdf"*

PG&E welcomes a meeting to discuss our methodology for cancelling tags deemed as "non-compelling", and any questions Energy Safety may have in regards TD-2305M-JA02 (Rev.14) or TD-2305M-JA02-B005 (Rev.00).

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
Ivan Garcia, Field Inspector, Energy Safety