State of California – A Natural Resources Agency
OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 15th Floor | Sacramento, CA 95814
916.902.6000 | www.energysafety.ca.gov

Gavin Newsom, Governor
Forest Kaser, Director

October 19, 2026

Daniel Kushner
Senior Director, Electric Risk & Compliance
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

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 November 18, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Lompoc, 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 pole ID 121181081, Grid Hardening ID 123728889 at coordinates 34.6814202554286, -120.436531262525. 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 from date 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

Patrick Doherty
Program Manager | Performance Assessment Division
Office of Energy Infrastructure Safety
Patrick.Doherty@energysafety.ca.gov

Cc:
Mandy Knockaert, PG&E
ARKN@pge.com
Rahima Manderola, PG&E
R12W@pge.com
Savannah Torres, PG&E
S6KZ@pge.com
Electric Data Requests
ElectricDataRequests@pge.com
WS Compliance, PG&E
WSComplianceMailbox@pge.com
Alexander Scott, Energy Safety
Alexander.Scott@energysafety.ca.gov
Babak Kaviani, Energy Safety
Babak.Kaviani@energysafety.ca.gov
Samuel Isaiah, Energy Safety
Samuel.Isaiah@energysafety.ca.gov
Shannon Greene, Energy Safety
Shannon.Greene@energysafety.ca.gov
assetperformance@energysafety.ca.gov

[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_AXS_20251118_1554
Inspector:	Alexander Scott
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 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:	November 18, 2025
City and/or County of Inspection:	Lompoc, Santa Barbara 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 Deficiencies

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	121181081	123728889	34.6814202554286, -120.436531262525	Tier 2	8.1.7.2 - Open Work Orders - Distribution Tags	Minor	Failure to complete work on open work orders - distribution tags.

Inspection Details

Deficiency 1

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:
In the 2025 Q2 Quarterly Data Report submission, PG&E reported that work on WMP initiative 8.1.7.2 – Open Work Orders – Distribution Tags were completed at Structure ID 121181081, Grid Hardening ID 123728889 at 2904-3218 Rucker Rd, Lompoc, CA, 93436, USA, 34.6814202554286, -120.436531262525. At this location the inspector observed distribution conductors extending from the adjacent pole that were under noticeable tension while five individual down guy wires attached to Structure ID 121181081 remained visibly slack. This observed load distribution suggests that a portion of the lateral load may be transferred to the conductors rather than being resisted by the down guy assembly. The original PG&E evaluation requested down guy wires to be tightened and the pole to be replaced, but PG&E's later FSR evaluation deemed pole replacement unnecessary, and that loose down guys did not need tightening. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers IA1Img1, IA1Img2, IA1Img3, and IA1Img4, depict slack down guy wires and strained conductors.

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

1. Field Safety Reassessment (FSR) was completed for pole replacement and loose down guy wires. Results of reassessment deemed scheduled repair/replacement unnecessary.
2. Although the FSR determination was consistent with the requirements of PG&E TD-2305M-JA02 Rev. 14, the assessment does not appear to have evaluated whether the observed slack in the down guy wires could result in increased tensile loading on the adjacent distribution conductors.

[6] Pacific Gas and 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" [Online]. Available: https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-2305m-ja02-overhead-assessment.pdf

3. Down guy wires were observed to be visibly slack while the adjacent distribution conductors appeared to be under tension, suggesting the conductors may be carrying a portion of the lateral load ordinarily resisted by the down guy assembly.

Energy Safety's proposal for a Corrective Action by PG&E is to tighten the down guy wires, if determined appropriate through engineering evaluation, in a manner that restores the intended load distribution and reduces or eliminates unnecessary tensile loading on the adjacent conductors.

Exhibits

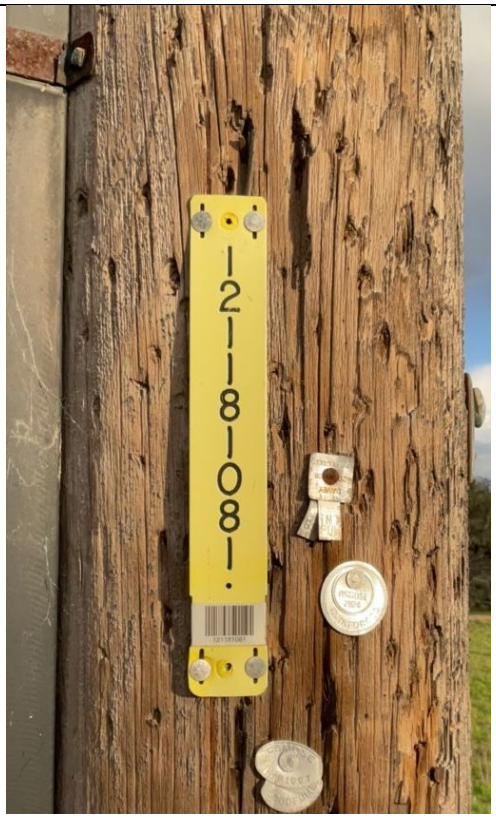
Exhibit A: Photo Log

Structure ID: 121181081

Deficiency 1



GImg1: Overall Structure.



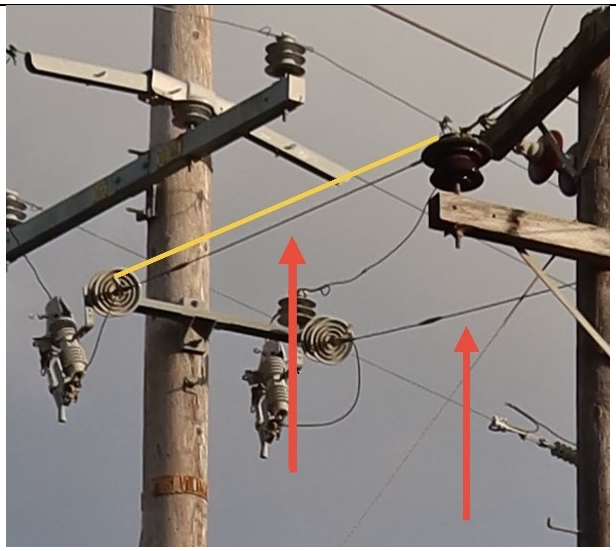
GImg2: Structure ID.



IA1Img1: Slack down guys.



IA1Img2: Slack down guys.

	
IA1Img3: Slack down guys.	**IA1Img4**: Conductors at tension.