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

September 25, 2026

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

NOTICE OF NON-PERFORMANCE

Mr. Daniel Kushner:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) conducted inspections of work completed by Pacific Gas and Electric Company (PG&E) in accordance with its 2026 Wildfire Mitigation Plan (WMP). During the inspections, Energy Safety determined the existence of non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON).

On September 9, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Garden Valley, California in High Fire Threat District (HFTD) Tier 2 and State Responsibility Area (SRA). The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that PG&E failed to implement its 2026 WMP initiative Distribution Routine Patrol 9.2.1, which requires compliance with Public Resource Code 4293, by not maintaining a four-foot clearance distance around the primary conductors near pole ID 120859842 at coordinates 38.86372541578513, -120.86428288592234. Energy Safety considers this non-performance to be in the Moderate risk category. PG&E must complete a corrective action for this non-performance by six months from the date of this notice.[1]

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

This response shall be filed in the Energy Safety e-Filing system under the 2026 NON Docket[2] and the associated file name(s) must begin with the NON identification number.

[1] Gov. Code section 15475.2(a)(2)
[2] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026%20NON

Prior to its response, PG&E 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 deadline.[3] Requests for informal conference with Energy Safety must be e-mailed to environmentalscience@energysafety.ca.gov, with a copy sent to me and Ricardo Garcia, Ricardo.Garcia@energysafety.ca.gov.

Sincerely,

Elizabeth McAlpine

Elizabeth McAlpine
Supervisory Environmental Scientist | Environmental Science Division
Office of Energy Infrastructure Safety
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[3] Energy Safety Performance Guidelines, p. 4

INSPECTION REPORT

Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts field inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation's wildfire risk. A Notice of Non-Performance (NON) is issued for any instances of non-performance identified during an inspection of its WMP initiatives.

Energy Safety has designated this finding of a deficiency as a "Moderate" risk. PG&E must correct the deficiency pursuant to the timeline provided in Table 1.[4]

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

[4] Energy Safety Performance Guidelines, p. 4

Inspection Summary

Energy Safety found a "Moderate" deficiency near pole ID 120859842 in HFTD Tier 2. PG&E failed to maintain vegetation at least four feet away from the primary conductors.[5]

The inspection location and WMP initiative summary are included in Table 2.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	PG&E
Report Number:	NON_ESD_PGE_GCA_20260909_1148
Inspector:	Gary Candelas
WMP Year Inspected:	2026
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2) 2026
Inspection Selection:	Energy Safety inspected the locations based on PG&E's Q2 QDR.
Relevant WMP Initiative(s):	Distribution Routine Patrol 9.2.1
Date of inspection:	September 9, 2026
City and/or County of Inspection:	Garden Valley, California

[5] Pacific Gas and Electric Company, 2026-2028 Base Wildfire Mitigation Plan Volume 1, Published December 30, 2025, p. 365 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60012&shareable=true accessed Sept. 22, 2026).

Inspection Findings

Deficiency 1

Relevant Requirement:

PG&E's WMP initiative 9.2.1 Distribution Routine Patrol "includes patrols designed to comply with state and federal laws and regulations, including:… Public Resource Code (PRC) Section 4293,"[6] which requires that PG&E maintain a four-foot minimum clearance distance in all directions between all vegetation and all conductors between 2,400 volts and 72,000 volts.[7]

Findings:

Energy Safety considers this deficiency as "Moderate" because PG&E failed to maintain the required minimum clearance distance between vegetation and its conductors, consistent with the requirements of Public Resources Code section 4293. A liquidambar tree was growing within the four-foot minimum clearance distance, and the continued encroachment presents a wildfire risk.

On September 9, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Garden Valley, California. During the inspection, Energy Safety observed a liquidambar tree growing within the four-foot minimum clearance distance near pole ID 120859842 and near coordinates 38.86372541578513, -120.86428288592234 along Brush Bunny Lane. The liquidambar tree is located within the SRA and HFTD Tier 2. The inspector measured the distance between the primary conductors and the closest branches of the liquidambar tree using a Nikon Forestry Pro II laser range finder. The measured distance was no more than 2.6 feet, which is less than the required four-foot clearance. According to the asset ArcGIS layer provided by PG&E, the operating voltage of the primary conductors is 12,000 volts. The liquidambar tree is approximately 26 feet in height and is located approximately 10 feet from pole ID 120859842. The inspector's observations are documented in Exhibit A photographs which are attached to this report. Photo 1 depicts pole ID 120859842. Photos 2, 3, and 4 depict the liquidambar tree within the four-foot minimum clearance distance.

In its Q1 2026 submission, PG&E reported inspecting the area on March 13, 2026 under its VM-16 Distribution Routine Patrol 9.2.1. Per its Q2 2026 submission, PG&E performed mitigation work in the area on May 15, 2026. Energy Safety's finding indicates that PG&E's Distribution Routine Patrol VM-16 program may not be sufficient to ensure that medium-to-fast growing species are inspected and trimmed to prevent encroaching within the minimum clearance distances.

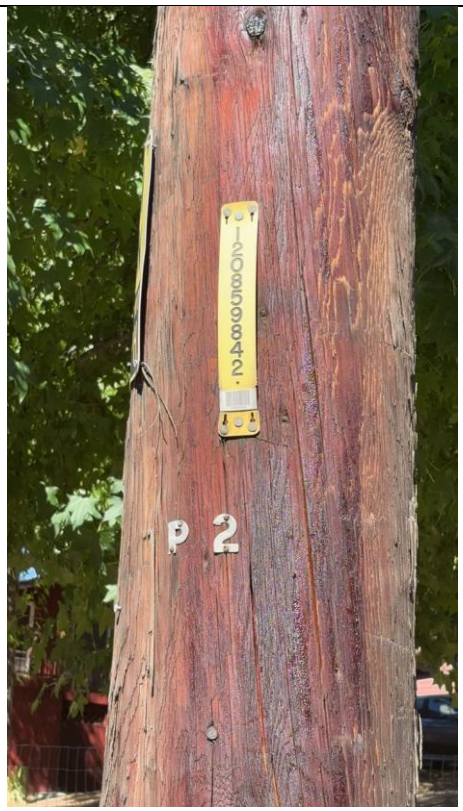
[6] Pacific Gas and Electric Company, 2026-2028 Base Wildfire Mitigation Plan Volume 1, Published December 30, 2025, p. 365 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60012&shareable=true accessed Sept. 22, 2026).
[7] https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4293.&lawCode=PRC, accessed September 22, 2026.

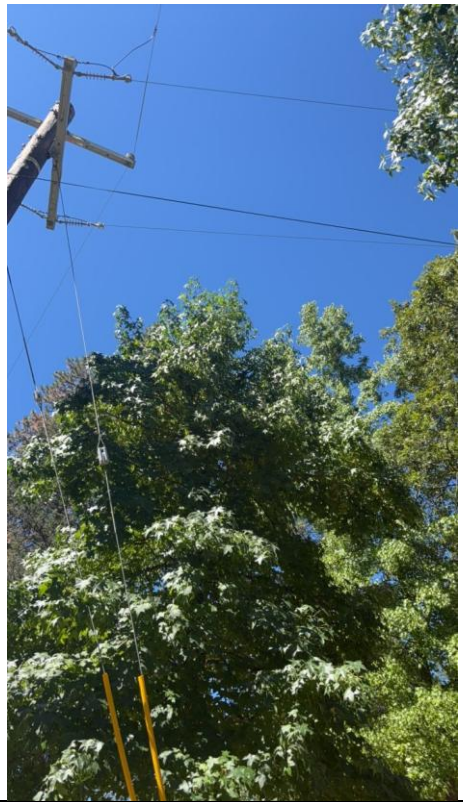
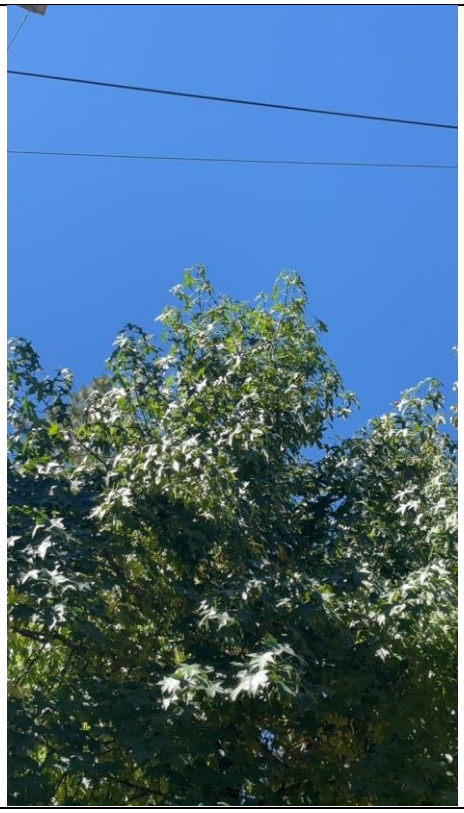
Exhibits

Exhibit A: Photo Log

Structure ID: 120859842

Deficiency 1

	
Photo 1: Photo of pole ID 120859842 located approximately 10 feet from the subject tree.	Photo 2: Photo of liquidambar tree within the four-foot minimum clearance distance from the primary conductors.

	
Photo 3: Additional photo of the same liquidambar tree within the four-foot minimum clearance distance from the primary conductor.	**Photo 4**: Close-up photo of the same liquidambar tree within the four-foot minimum clearance distance from the primary conductor.