Pacific Gas and Electric Company®

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October 26, 2026

Elizabeth McAlpine
Supervisory Environmental Scientist | Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Energy Safety NON ID: NON_ESD_PGE_GCA_20260909_1148
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 Ms. McAlpine:

This letter is in response to the above referenced Notice of Nonperformance (NON) dated September 25, 2026, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2026 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Second Quarter (Q2) 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 September 9, 2026 inspection by Energy Safety in the vicinity of the city of Garden Valley, CA, a Tier 2 High Fire Threat District (HFTD) of PG&E's Q2 QDR report for WMP Initiative 9.2.1 – Distribution Routine Patrol, Utility Initiative VM-16:

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.

Response

PG&E acknowledges Energy Safety's observation of failure to maintain a four-foot clearance near pole ID 120859842 at coordinates 38.86372541578513, -120.86428288592234, identified on September 9, 2026, and agrees that a non-performance exist. On October 1, 2026, PG&E conducted a field review of the subject tree and determined the tree to be out of compliance with the minimum four-foot vegetation clearance requirement specified under WMP Initiative 9.2.1 Distribution Routine Patrol and Public Resources Code (PRC) Section 4293.

PG&E evaluated mitigation options and determined that trimming the subject liquid amber tree is the appropriate corrective action to restore compliance with the four-foot minimum vegetation clearance requirement under PRC Section 4293. The tree was prescribed for trim in PG&E's system of record under Vegetation Point (VP) 07822004 and Prescription RX-08293624 and the subject tree was trimmed on October 23, 2026.

Please refer to the following photos documenting the completed work:
"PGE_NON_ESD_GCA_20260909_1148_20261026_ATCH001_REDACTED.pdf"
"PGE_NON_ESD_GCA_20260909_1148_20261026_ATCH002.pdf"
"PGE_NON_ESD_GCA_20260909_1148_20261026_ATCH003.pdf"

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: Shannon Greene, Program & Project Supervisor, Energy Safety
Patrick Doherty, Program Manager, Energy safety
Gary Candelas, Field Inspector, Energy Safety