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 29, 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 2026 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 August 12, 2026, Energy Safety conducted an inspection of Pacific Gas and Electric Company's WMP initiatives in the vicinity of the city of Annapolis, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2026 WMP initiative Traditional Overhead Hardening – Transmission Conductor (Shunt Splice), PG&E failed to complete work on a Shunt Splice on Structure ID 050/010, Grid Hardening ID 130913296 at coordinates 38.73011, -123.42350. 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 2026 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=2026%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
Romeo Marroquin Ajcac, Energy Safety
Romeo.MarroquinAjcac@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

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_20260812_1412
Inspector:	Romeo Marroquin Ajcac
WMP Year Inspected:	2026
Quarterly Data Report (QDR) Referenced:	Quarter 1 (Q1)
Inspection Selection:	Energy Safety viewed the contents of the Q1 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.2.5.1 - Traditional Overhead Hardening – Transmission Conductor (Shunt Splice)
Date of Inspection:	August 12, 2026
City and/or County of Inspection:	Annapolis, Sonoma 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	050/010	130913296	38.73011, -123.42350	Tier 2	8.2.5.1 - Traditional Overhead Hardening – Transmission Conductor (Shunt Splice)	Minor	Failure to complete work on Traditional Overhead Hardening – Transmission Conductor (Shunt Splice)

Inspection Details

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.2.5.1:

1. "A conductor splice is a point of potential failure within a conductor span. A shunt splice is applied directly over the existing splice and extends some distance on either side of the splice. The installation of a shunt splice on top of the existing splice eliminates the splice as a single point of failure because with the shunt, a failure of the original splice would not result in a downed conductor."[6]

Findings:

On Structure ID 050/010, Grid Hardening ID 130913296 at 38442-38460 Noce Rd, Annapolis, CA, 95412, USA, 38.73011, -123.42350 the inspector observed that the subsets in the preformed shunt splice (PSS) were not wrapped directly over the existing splice. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers Asset Image 1 and Asset Image 2 depict PSS subsets that were not wrapped directly over the existing splice. Asset Image 3 references the standard TD-1028P-01, R1 to evaluate the condition of the shunt splice. In the 2026 Q1 Quarterly Data Report submission, PG&E reported that work on WMP initiative 8.2.5.1 **-** Traditional Overhead Hardening – Transmission Conductor was completed at this location.

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

1. The inspector observed that the subsets in the preformed shunt splice were not wrapped directly over the existing splice.

[6] Pacific Gas & Electric Company, "PG&E 2026-2028 Approved Wildfire Mitigation Plan R3," December 30, 2025, p. 208. [Online]. Available: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60012&docket=2026-2028-Base-WMPs&shareable=true

Exhibits

Exhibit A: Photo Log

Structure ID: 50/10

Deficiency 1

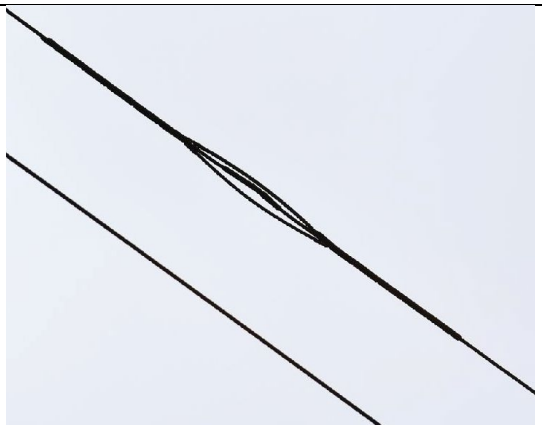
<table>
<tr><td></td><td>
</td></tr>
<tr><td>General Image 1: Overall Structure.</td><td>General Image 2: Structure ID.</td></tr>
<tr><td></td><td></td></tr>
<tr><td>Asset Image 1: Preformed shunt splice.</td><td>Asset Image 2: Preformed shunt splice (second view).</td></tr>
</table>

Exhibit B: Construction Standards

Construction Standard: TD-1028P-01, R1, Splice Shunts Installation for Transmission Line Overhead Conductors

Deficiency 1

Convenience Copy

Splice Shunts Installation for Transmission Line Overhead Conductors

2.6 (continued)

3. In a rotating fashion, APPLY all subsets on the conductor or strand at the same time.

2.7 During installation, KEEP the subsets tight.

3 Installing a PSS by Hand

3.1 SELECT a subset with the **most** rods as the first subset to be installed.

1. IF the subsets contain an equal number of rods,

   THEN SELECT any.

3.2 Facing the splice, DETERMINE the right and left sides.

3.3 POSITION the center color mark of the cabled section over the center of the compression splice.

1. SEE Figure 3 below.

www.pdftron.com

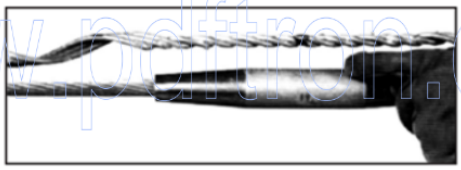


Figure 3. Positioning Center Color Mark

3.4 HOLD the center section of the subset relatively parallel to the splice.

3.5 Starting at the crossover mark, WRAP the subset on the conductor or strand.

1. SEE Figure 4 below.



Figure 4. Wrapping the Leg

3.6 ENSURE the leg ends are snapped into place.

 ©2025 Pacific Gas and Electric Company. All rights reserved.

Asset Image 3: PG&E' Splice Shunts Installation for Transmission Line Overhead Conductors standard, p. 7.