State of California – A Natural Resources Agency
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Gavin Newsom, Governor
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November 4, 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 Aptos, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2026 WMP initiative Distribution Tags, PG&E failed to complete work on a Distribution Tag on Structure 122531544, Grid Hardening ID 124096647 at coordinates 36.99946312851552, -121.88551429366318. 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
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[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_IAG_20260812_1541
Inspector:	Ivan Garcia
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):	8.6.2 – Distribution Tags
Date of Inspection:	August 12, 2026
City and/or County of Inspection:	Grass Valley, Nevada 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	122531544	124096647	36.99946312851552, -121.88551429366318	Tier 3	8.6.2 – Distribution Tags	Minor	Failure to complete work on Distribution Tags

Inspection Details

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.6.2:

1. "Cumulative closures, as used above for GM-03, are the total closures since 2026. Only creations and closures that have a compliance due date by end of 2029 count toward this commitment. The term "close" as used above means the closure of: (1) duplicate EC tags; (2) EC Tags where condition is confirmed to no longer exist; and (3) EC Tags where the compelling condition does not qualify as a tag based on the latest criteria defined in the inspection criteria standard, and/or qualifies as Opportunity Maintenance and is exempt from Rule 18 timelines."[6]

PG&E's WMP states the following regarding initiative 8.4.6 Distribution Pole, Condition Monitoring:

1. "Some of the pole conditions that are monitored include broken/damaged, split, visually deteriorated, leaning, woodpecker damage, deformed, and overstressed. A full list of conditions that are monitored are defined in TD-2305M-JA02."[7]

Findings:

On Structure ID 122531544, Grid Hardening ID 124096647 at 2493-2519 Trout Gulch Rd, Aptos, CA, 95003, USA, 36.99946312851552, -121.88551429366318, the inspector observed a woodpecker hole greater than one (1) inch in diameter and within two (2) inches of attachment hardware at this location. 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 a woodpecker (WP) hole present near the top of the pole and Item1IB1Img1-1 and Item1IBImg1-2 are references used to evaluate the pole condition. In the 2026 Q1 Quarterly Data Report Submission, PG&E reported that work on WMP initiative 8.6.2 - Work Orders – distribution tags, was completed at this location.

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

1. A distribution tag that had been created for the inspection location was cancelled and found not be "non-compelling per updated TD-2305M-JA02, Rev. 15" according to PG&E's distribution tag long text.
2. Inspector observed a woodpecker hole greater than one (1) inch in diameter and within two (2) inches of attachment hardware at this location.
3. Woodpecker holes greater than (1) inch in diameter and within two (2) inches of attachment hardware warrants pole reframe or replacement per PG&E document TD-2305M-JA02, Rev. 15.

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[6] Pacific Gas & Electric Company, "PG&E Wildfire Mitigation Plan R3, 2026-2028, Volume 1 of 2," December 30, 2025, p. 323. [Online]. Available: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58219&docket=2026-2028-Base-WMPs&shareable=true

[7] Pacific Gas & Electric Company, "PG&E Wildfire Mitigation Plan R3, 2026-2028, Volume 1 of 2," December 30, 2025, p. 278. [Online]. Available: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58219&docket=2026-2028-Base-WMPs&shareable=true

Exhibits

Exhibit A: Photo Log

Structure ID: 122531544

Deficiency 1

<table>
<tr><td></td><td>
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<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: Woodpecker hole.</td><td>Asset Image 2: Woodpecker hole (detailed view).</td></tr>
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WOODPECKER DAMAGE 1-3 INCHES	
	**At this Location:** Single hole 1-3 inches within 2 inches from attachment hardware.  **Perform Minor Work:** No **Write 3rd Party Notification:** No **Write EC Notification:** Yes **FDA=** Pole / Woodpecker Damage / Replace or Pole / Broken Damage / Reframe* **Priority=** Minimum E Tag, depending on exposure. **Note:** Inspector should use judgement on if pole can be reframed instead of replaced

Item1IB1Img1-1: Pacific Gas and Electric Company TD-2305M-JA02 REV 15, pg. 48

Woodpecker

General Guidance: Visually inspect poles for woodpecker damage based on the flow chart below.

- A through hole counts as two holes
- A filled hole is still considered a hole.
- Consider reframe instead of replacing where possible.



Item1IB1Img1-2: Pacific Gas and Electric Company TD-2305M-JA02 REV 15, pg. 44.